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2500.00.00 IMPACT PROCESSING

This chapter contains IMPACT policy including:

- Participation Rates (Section 2505.00.00)
- Applicant Services (Section 2510.00.00)
- Case Management (Section 2515.00.00)
- IMPACT Assessment (Section 2525.00.00)
- Self-Sufficiency Plans (Section 2530.00.00)
- IMPACT Activities (Section 2540.00.00)
- IMPACT Compliance (Section 2545.00.00)
- IMPACT Supportive Services (Section 2550.00.00)

2505.00.00 WORK PARTICIPATION RATE (C)

The TANF IMPACT Program must meet a specific federally mandated “Work Participation Rate” in order to receive all possible federal funds by the participation rate and participation hours.

The participation rate is defined as the percentage of work-eligible individuals who are meeting all of their required participation hours.

Participation hours are defined as the number of hours in which each work-eligible individual is participating in an approved IMPACT activity.

All TANF families, not just those with IMPACT mandatory individuals, are counted in the participation rate calculation.

2505.05.00 TANF WORK PARTICIPATION RATES FOR ALL FAMILIES (C)

The All-Family work participation rate is calculated by dividing the number of Two-Parent TANF and Regular TANF AGs which meet the average number of hours of employment and/or work activities by the total number of Two-Parent TANF and Regular TANF AGs.

If a sanction is imposed, the TANF case is closed and will not be considered in the calculation of the participation rate after the effective date of closure which could be either the end of the current month or the next month.

Families that are not included in this calculation:

- AGs headed by single parents with a child under twelve (12) months of age.
- AGs receiving a \$0 grant due to income.
- Child only AGs

Meeting the requirement: Individuals meet the work requirement if one of the following is true:

- The case head is an adult who is participating an average of 30 hours per week in work-related activities/components of which at least 20 hours are in one or more of the “core” activities listed below.

- A two-parent family, at least one parent is meeting the preceding work participation requirement.
- The case head is age 20 or older and the only parent/caretaker relative of a child under age six (6) and is participating an average of 20 hours per week in “core” activities.
- The case head is a teen parent aged 19 or under who is either maintaining satisfactory school attendance or involved in education directly related to employment for an average of at least 20 hours per week.

Core activities/components:

- Unsubsidized private and public Employment
- Subsidized Private and Public Sector Employment
- Community Work Experience Program - (CWEP)
- Community Service
- Vocational Educational Training
- On-the-Job Training
- Job Search/Job Readiness

Indiana restricts total participation in job search/job readiness to 12 weeks. Only 4 weeks in any combination of these 2 activities may be consecutive.

Non-Core Activities/components: Recipients may participate in non-Core activities after the 20 hour per week Core requirement has been met. Non-Core activities include:

- Academic Training.
- Vocational training (if an IMPACT participant for less than 12 months).
- Vocational training that will lead to an advanced degree (must be completed within the 24-month limit for cash assistance).
- Job Skills Training (if employed or seeking employment at least 20 hours per week).

WPR compliance for non-graduate parent/caretaker under 20 with children under 6:

- Satisfactory attendance (as defined by the school) in high school or high school equivalency.
- 20 hours or more per week of adult basic education or English language proficiency.

2505.10.00 IMPACT REQUIREMENTS FOR THE TWO-PARENT TANF AG (C)

Work-eligible parents in the family must participate in work activities as defined below:

- If receiving federally funded childcare assistance (CCDF), and no adult or child has a disability, at least 55 hours per week.
- Not receiving CCDF or one or more members of AG have a disability, at 35 hours per week.

2510.00.00 APPLICANT SERVICES (C)

As a condition of eligibility for TANF Cash Assistance, TANF applicants deemed IMPACT mandatory during the data gathering process, are required to:

- Complete Applicant Job Search (AJS) Orientation; Applicant Job Search; Self-Sufficiency Assessment and Self-Sufficiency Plan.

- Complete 6 contacts with employers; 3 of which need to be Applications.

IMPACT Supportive Services for AJS:

- Transportation services- This is only to be given if participant is unable to complete their 6 contacts during their Orientation appointment.
- Childcare is limited to 6 weeks for an AJS participant- This is only to be given if participant is unable to complete their 6 contacts during their Orientation appointment.

AJS Exemptions:

- is less than eighteen (18) years of age.
- is more than sixty-four (64) years of age.
- is medically certified as unfit for employment.
- is pregnant.
- is a parent or caretaker who personally provides care for someone with a disability/serious medical condition.
- is receiving unemployment compensation and complying with DWD.
- is participating in a treatment and rehabilitation program or a drug or alcohol addiction program.
- Is participating in:
 - An adult basic education program
 - Course of Study at a post-secondary institution
 - Has been awarded a federal or state financial aid award or grant.
- is a victim of domestic or family violence in last 60 days.
- separated from service in the armed forces not more than one hundred eighty (180) days before applying for TANF assistance; or
- has experienced homelessness in the last 60 days.
- has a child under 12 weeks of age.
- is in a county that the unemployment rate exempts them due to greater than 10% rate, designated as a labor surplus area.

AJS Compliance:

- Failure to attend a scheduled Orientation/Assessment Interview and participate in the activities specified on the individual's SSP will result in a Notice of non-compliance.
- Applicant may provide a good cause explanation by the time frame noted in the notice.
- If good cause is granted, an exemption to AJS will be granted.
- If good cause is not granted, the TANF application will be denied, and applicant must reapply.

Reasons for good cause include:

- The required actions were beyond the capability of the participant to perform, or the circumstances were beyond the individual's ability to control. A supervisory determination is required to grant a good cause exemption from AJS and allow TANF to be authorized.
- TANF applicant is residing in a domestic violence shelter.

2515.00.00 IMPACT CASE MANAGER RESPONSIBILITIES

During the initial IMPACT appointment, the IMPACT case manager (CM) must explain to the payee/caretaker relative of the Assistance Group (AG), or the individual required to participate, both orally and in writing, the following information:

- The participation requirements.
- Each allowable exemption.
- The right to a fair hearing.
- The requirement that changes which would affect IMPACT status (for example, child aged 16 or 17 no longer in school, or recovery from illness or incapacity) be reported to the IMPACT Office within 10 days of the change.
- The penalties for refusing to participate.

The payee of the AG is responsible for sharing this information with all other AG members required to participate. Any AG member may contact the IMPACT case manager for clarification of the information.

An authorized rep (AR) cannot complete an orientation, other appointments, or participate for a client referred to IMPACT. An authorized rep can assist the participant in understanding their responsibilities but cannot complete any IMPACT responsibilities for the client. The client is solely responsible to complete all IMPACT requirements and sign all documents accordingly.

2520.00.00 CASE MANAGEMENT

There is a requirement of an uninterrupted continuum of service that begins at orientation and ends when the client chooses to disengage with E & T services, or when the federal limit of job retention services is met. This continuum of service is focused on customer centered case management. A personal relationship between an assigned case worker and an E & T client must be developed beginning at the time of assessment, and it is expected that a single case manager will remain assigned to the client throughout the duration of services. Client engagement is encouraged, supported, and nurtured by the personal relationship with the case manager and demonstration of interest in the client's needs, strengths, and challenges. Services are individualized to meet the needs and goals identified at assessment. All decisions about component participation, area of career interest, pursuit of job opportunities, etc. should be based on the personal goals and objectives of the client with the input, knowledge, and expertise of the case manager.

Case managers will provide the minimum services noted below:

- Individual Self-Sufficiency Plan Assessment
- Assisting AJS participants in meeting the AJS requirements
- Development of the Self-Sufficiency Plan (SSP) with the participant that will include both short and long-term goals for attaining self-sufficiency.
- Acknowledge and support client's own goals and objectives and incorporating them into plans and interactions.
- Communicate the options and opportunities the IMPACT program offers.
- Provide referrals to appropriate community resources or services.

- Monitor participation hours.
- Provide supportive services.
- Evaluate outcomes.
- Assist in troubleshooting and resolving issues that are preventing client from succeeding.
- Maintain confidentiality.

2525.00.00 IMPACT ASSESSMENT

The purpose of the four-page IMPACT Self-Sufficiency Plan Assessment, completed between client and IMPACT case manager, is to:

- identify individual and family strengths upon which to build;
- barriers to employment and/or self-sufficiency;
- supportive services necessary to help the participant comply with IMPACT Program requirements; and/or
- the need for other services available within the community.

The Self-Sufficiency Assessment and the Self-Sufficiency Plan (SSP) will be completed at the initial IMPACT Orientation session.

Assessments should be updated as needed based on the participant's circumstances or at minimum every six (6) months.

The participant must be actively involved in the completion of the assessment and in creating the self-sufficiency plan, including in identifying strengths, interests, and goals. Details about IMPACT rights, responsibilities, activities, and supportive services are also included as part of the assessment process. Upon completion of the Self-Sufficiency Plan Assessment, an individualized Self-Sufficiency Plan (SSP) is developed with the participant.

The SNAP IMPACT Reporting Requirements Notification is to be signed by all SNAP participants to acknowledge receipt of this notification. The form will also be signed by IMPACT staff.

An assessment must include:

- Work Experience:
 - Listing of all jobs with details including dates of employment, duration, and reason for leaving.
- Education and Training:
 - Current levels of education completed. Training details including type of training, dates of training, and credentials received.
- Job Skills:
 - Skills/experience obtained via employment, training, hobbies, etc.
- Career/Occupational Interests:
 - type of employment desired, shift availability, travel distance, limitations on work, etc.
- Military Service:
 - Branch, period of active duty, rank at discharge and duties.
- Personal and Family Health:

- Physical and mental health status of the participant and the individual's immediate family members and how they may affect the participant's employment. If caring for an incapacitated person, the relationship and time required.
- Transportation Resources:
 - What type of transportation is accessible and used, and if transportation assistance is needed.
- Child Care Needs:
 - Determine the need for reliable childcare and the presence of any special needs that must be addressed in the development of the childcare plan.
- Support Network:
 - Identify those persons who provide emotional, social, or other support to the individual and family.
- Other Barriers to Participation:
 - Legal problems, criminal background, health issues, lack of appropriate clothing, housing concerns, and lack of recent work history.
- ABAWD Screening for Fitness for Work:
 - SNAP ABAWD participant that states or indicates on the IMPACT Assessment, a physical or mental disability or condition that is a barrier to obtaining or maintaining employment, a Statement of Medical Condition is to be provided.

An IMPACT staff person must determine if the work registration status needs to change. If a change is necessary, the IMPACT staff must notify eligibility staff via the appropriate regional mailbox.

Provider Determination: If an E&T participant is assigned to a given activity, and the provider of that activity determines that the individual is not suited to that activity (known as a provider determination), steps must be taken to address the situation.

- Any organization providing services to E&T participants is required to report no less than weekly on the progress/status of each participant. If the participant is determined unsuitable for a given program, immediate action will be taken to pursue appropriate services.
- If the participant is an ABAWD and an alternate activity cannot be found, the month in which the client is notified of this determination will not be recorded as a countable month toward the ABAWD time limit. A manual override to the ABAWD status for that month may be required.
- If during the review of suitability for alternate E&T services, it is determined that the work registration status needs to be reviewed/reconsidered, detailed notes regarding observations or verifications received will be recorded in case notes.
- IMPACT policy staff will review and make a request to state eligibility staff to review and reconsider work registration status as appropriate.
- If the individual is determined to still be an ABAWD and remains non-compliant with work requirements in subsequent months, countable months will resume as appropriate.

Any time there is a provider determination, an alternate suitable activity should be pursued for the individual. Client will be notified by an IMPACT policy consultant by phone of this change within 10 calendar days, and document when the notification occurs in the participant's case file. If the client is an ABAWD, they must also be informed that they might accrue countable months

toward their three-month participation time limit the next full benefit month after the month during which the State contacted them unless they fulfill the work requirement, have good cause, live in a waived area or are otherwise exempt.

If it is suspected that the individual should be exempt from work registration, or there is a need to revise an ABAWD monthly status, a request for review of work registration status or ABAWD monthly status should be submitted to eligibility staff via the appropriate regional mailbox.

2530.00.00 SELF-SUFFICIENCY PLANS

The Self-sufficiency plan is completed with the client upon completion of the self-assessment, on the same day as the orientation appointment. The SSP is an agreement signed by the participant and the IMPACT case manager. Participation in allowable work activities must begin as soon as possible for TANF mandatory IMPACT participants and SNAP participants.

The Self-Sufficiency Plan (SSP) should:

- Be developed based on the results of the self-assessment.
- Be individualized and clear regarding specific goals and accompanying timelines for completion.
- Be detailed including being: "Specific, Measurable, Attainable, Result Oriented, and Time-Limited" (SMART).
- Be designed to move the individual into appropriate employment or training.

Each SSP will address:

- Have A clearly defined and realistic employment goal stating that the participant is expected to seek, accept, and maintain full-time employment unless participating in employment and training activities intended to prepare one for employment.
- Include the strengths and barriers identified during the assessment process.
- Include clearly defined activities necessary to achieve the primary goal of economic self-sufficiency for the family; listed under the "IMPACT Activity" on SSP.
- Identify detailed steps, addressing identified barriers, that will help the individual follow through and/or fulfill the requirements of the activities through IMPACT supportive services or other community resources.
- Address needed supportive services.
- Identify anticipated outcome details including all aspects of the expectations and desired results.
- Set realistic time frames for completing each activity by specifying a realistic "Assignment Date," a "Projected Completion Date," and "Weekly Participation Hours" that is anticipated will be needed to achieve self-sufficiency. Participation hours are entered daily for AJS and weekly for TANF and SNAP.
- Address the TANF 24-month clock: A reminder of the time remaining for those individuals who are, or will be, subject to the 24-month limit to cash benefits.
- Address the ABAWD 3-month clock: A reminder of the time remaining for those individuals who are subject to the 3-month limit for ABAWDs and should be included as part of the 'actions or steps details of the IMPACT activity that will help the participant fulfill the work requirement.

- Include signature of the participant and IMPACT case manager.

By signing the Self-Sufficiency Plan (SSP), participants agree to perform the activities assigned on the SSP. SSP's are signed by case manager and participant and client must receive a copy of the signed SSP.

NOTE: Individuals in treatment for domestic violence, substance abuse, or mental health problems may find it difficult to participate all the hours necessary to meet IMPACT requirements. Therefore, following consultation with the participant's treatment professional and the IMPACT supervisor, the Case Manager may approve reduced participation hours, if appropriate. This must be documented in the System of Record.

Good cause for AJS/TANF: There may be instances in which an individual will require up to 90 days, or more, of good cause time due to a verified medical condition before beginning or resuming IMPACT activities. The SF 54717 – STATEMENT OF MEDICAL CONDITION FOR DETERMINATION OF PARTICIPATION IN THE IMPACT PROGRAM, or other approved medical verification, is required to complete the Good Cause SSP. Good cause is not allowable for SNAP participants. Follow-up calls with the IMPACT case manager are to be done every 3 months to re-assess the individual's condition. A new medical form is not needed unless the form we have on file is expired, or the client states their condition has changed.

2540.00.00 IMPACT ACTIVITIES

IMPACT activities are the employment, training, and educational activities, assigned to participants, to help participants move towards economic self-sufficiency. Activities should reflect the needs of the family and focus on removing barriers to employment. Activities may differ for TANF, SNAP volunteers, and ABAWD's.

2540.05.00 REPORTING IMPACT HOURS (C)

Scheduled activity hours are recorded in the system of record (SOR), which is the IMPACT System. TANF IMPACT recipients' actual weekly hours of participation and excused absences are to be entered by the 10th of the month. Accurate recording of countable hours is required for accurate TANF Work Participation Rate (WPR) reporting. Employment hours for WPR reporting is gathered from information recorded in IEDSS. An IMPACT worker is required to report the employment verification two days of becoming aware of the information. Hours are counted per activity when activities are stacked by case manager.

Countable participation hours include:

- Homework time (secondary and post-secondary educational activities such as instructional certificate programs and industry skill certification):
 - Client receives one hour of homework credit per credit hour. If there are no credited hour count, such as for short term CNA or similar class, report "hours only" and document in notes. "Hours Only" may be appropriate method when there are no course credits assigned and should be noted on attendance form. If

Except for employment, scheduled hours of weekly participation in IMPACT activities are recorded in the System of Record (SOR).

TANF activities/components include:

- Unsubsidized Private and Public Sector Employment
- Subsidized Private and Public Sector Employment
- Job Search and Job Readiness
- Community Work Experience Program (CWEP)
- Community Service Programs
- Vocational Training
- Job Skills Training
- Academic Activities
- High School (HS) attendance and High School Equivalency (HSE) classes for TANF recipients aged 19 and under who are heads of household.
- On-the-Job Training (OJT)
- Job Retention Services

SNAP activities/Components:

- Supervised Job Search
- Job Readiness
- Work Experience Program (WE)
- Community Work Experience Program (CWEP/Workfare (W))
- Vocational Training
- Educational (Academic)
- Job retention Services

2540.10.05 UNSUBSIDIZED EMPLOYMENT (C)

Unsubsidized Employment (including Self-Employment) is defined as any activity involving effort on the part of the participant for which wages, salaries, commissions, or profits are paid and this payment is not subsidized by the State or Federal programs such as IMPACT, Workforce Investment Act (WIA) and Vocational Rehabilitation, or would be paid if the participant had not chosen the option to receive goods for services for the performed activity (in-kind earnings). Unsubsidized employment (including self-employment) is included in case notes; recorded in Eligibility and/or IMPACT SOR; and documentation retained.

Counting unsubsidized employment hours/income:

- The number of actual participation hours are verified from employer produced documentation substantiating number of hours worked/income. Projected hours up to 6 months are based upon one full pay period representing continuing circumstances.

Counting self-employment income:

- Self-employed individuals must verify gross earned income and expenses. Countable monthly hours are based on gross income minus 40 percent for expenses or actual expenses, whichever is greater, divided by the federal minimum wage. Monthly hours are divided by 4.33 to find the countable weekly participation hours.

2540.10.10 SUBSIDIZED PRIVATE AND PUBLIC SECTOR EMPLOYMENT (C)

Subsidized Private or Public Sector Employment includes paid employment for which an employer receives a subsidy from TANF or other public funds to offset the cost of some or all the wages and costs of employing a participant.

Counting subsidized employment hours:

- Hours worked are verified and recorded in the same way as “unsubsidized employment” described above.

2540.10.15 JOB SEARCH

Job Search activities are designed to assist a recipient to immediately apply for and find employment leading to economic self-sufficiency for participants who has recent work experience, satisfactory work history or able to re-enter the workforce with minimal time or IMPACT assistance. Job search activities must be documented on Job Search Worksheet provided by case manager. The Job Search Worksheet, verifying employer contacts, must be submitted to IMPACT office at least weekly unless specified on SSP. SNAP participants in the supervised job search component must be directly supervised at state approved locations or employ website with contact from the case manager.

Job Search and Job Readiness activities include how to:

- Search for job openings.
- Complete employment applications.
- Interview for positions, including follow-up contacts.
- Write thank you notes to potential employers.

“Actual time” utilized is credited for each internet and “in-person” employer contact. The number of hours reported by the recipient is not to include travel time to the first or from the last “in-person” employer contact.

- 30 minutes of job search time per application submitted is credited
- Time in excess of 30 minutes will be credited only if job search is being conducted in a DFR office, or utilizing a search engine that is tracking time engaged.
- Verification of job search time in excess of 30 minutes is required and can include a printout from the search engine; worksheet signed by case manager, or other approved verification.

Printed applications or the receipt issued verifying application was received, is required for online applications. “Start” and “End” times per job search, must be included on Job Search worksheet for hours to be calculated.

Counting participation hours:

- **For TANF IMPACT participants:**
 - Job Search and Job Readiness activities will NOT count toward the work participation rate after a combined total of twelve (12) weeks of Job Search and Job Readiness activities have been completed, within a rolling 12-month period.
 - Only four of those weeks may be consecutive.
 - A single reported hour of Job Search will count as one (1) week of Job Search activities in both the four (4) consecutive weeks and the remaining eight (8) weeks of the rolling 12-month period.
 - Participants may continue in this activity with other activities, to enhance their employability, if self-sufficiency through employment has not been obtained. However, the job search activity hours will not be counted when calculating the TANF work participation rate (WPR).

- **For SNAP ABAWDs:**
 - Supervised Job Search is not a qualifying activity unless offered in combination with other IMPACT activities and comprises less than half (10 hours) of the 20-hour requirement.
 - ABAWDs may also participate for a total of eight (8) weeks in Supervised Job Search in any 12 consecutive months when the activity counts for <50% of the total weekly required hours.

2540.10.20 JOB READINESS

Job Readiness:

- Provides employment preparation for IMPACT participants.
- Prepares the participant for employment of at least 20 hours per week.
- Familiarizes them with general workplace expectations, behavior, and attitudes necessary to compete successfully in the labor market.
- Provides practice in completing job applications, resume development, and interviewing techniques, job retention and job coping provided through workshops.
- Substance Abuse and Mental Health Treatment or Rehabilitation Services to retain employment (not applicable to SNAP only recipients), will be considered Job Search and Job Readiness activities if deemed necessary by a qualified medical or mental health professional.

2540.10.25.05 JOB RETENTION (S)

The job retention component is meant to provide supportive services for at least 30 days and up to 90 days to individuals who have secured employment. Individuals are eligible to receive job retention services if:

- Received SNAP benefits in the month of or the month before they start job retention activity/component.

- After leaving SNAP unless the individual leaving SNAP due to a failure to comply with the general work requirement or an intentional program violation.

Individuals must have obtained employment while actively participating in SNAP E&T and completed at least one hour in an allowable activity. There is no limit to the number of times an individual may receive job retention services, if the individual has re-engaged with E&T prior to obtaining new employment.

Job retention services can include:

- Job coaching and troubleshooting issues that may impact employment.
- Helping a participant identify a childcare provider.
- Supportive services such as clothing required for the job, transportation, and childcare.

2540.10.30 IMPACT COMMUNITY WORK EXPERIENCE PROGRAM- CWEP

The Community Work Experience Program (CWEP) work activity provides a participant an opportunity to acquire general skills, knowledge, and work habits necessary to obtain employment with the purpose to improve the employability of those who cannot find unsubsidized full-time employment. The primary goal of CWEP is to improve employability and encourage individuals to move into regular employment, a short-term preparation for employment.

TANF participants can perform work at private sector employment sites or for the direct benefit of the community such as health, social service, environmental protection, education, recreation, public facilities, and public safety.

SNAP recipients can perform work in a public service capacity, limited to public and private non-profit employers.

Sites are supervised by an employer, work site supervisor, or other responsible party daily. The CWEP site employer receives the services of an additional worker at no cost; and may hire the participant as a trained employee.

The IMPACT Office staff will:

- Define the CWEP requirements for each participant.
- Informs the work site supervisor of the maximum number of hours each participant is to participate and the expected length of the placement.
- Establish Community Work Experience Program sites.
- Visit potential sites to assess work environments.
- Review the participants SSP within 3 months of being placed at the worksite.
- Determine if the employer intends to hire the participant within 3 months.
- If no employment is offered within 3 months another activity will be assigned.

The CWEP employer will:

- Provide work-related guidance and mentoring, daily oversight of work assignments.
- Evaluate work skills as part of the formal agreement between the IMPACT Program and the employer.

- Meet regularly with the participant to discuss the participant's work.

CWEP activities are designed to help participants:

- Gain work experience while fulfilling activity program hours.
- Attain and improve key work skills and attitudes needed for transitioning into the workplace.
- Benefit from positive role models.
- Increase self-esteem.
- Enhance their resume.

CWEP assignments are limited to six (6) months per client in a thirty-six (36) month period, for ninety (90) days at a time. Additional months must be approved by state policy in advance of any additional months being assigned.

ABAWD's may participate in up to thirty (30) consecutive calendar days of Supervised Job Search as part of their CWEP assignment following their initial SNAP certification but prior to placement at CWEP site. Participants are considered participating and complying with IMPACT during this Supervised Job Search period and fulfilling the ABAWD work requirement if they are meeting their household's calculated CWEP participation hours.

Community Work Experience Program (CWEP) and Work Experience (WE) Job Request forms must be completed before a site is active. The site will remain active until IMPACT staff or site management ends the agreement. The CWEP site manager agrees the site will:

- Provide a sanitary and non-hazardous work environment that ensures the health and safety of participants with the same health and safety standards established under state and federal laws for employees.
- CWEP participants will not be placed on assignments that replace or prevent the employment of regular employees and assignments provide the same benefits and working conditions provided to regular employees performing comparable work for comparable hours.
 - If a union position, all union rules, and contractual agreements must be followed.
- CWEP participants will not be involved in any unethical, political, or religious activities.
- CWEP participants will be provided adequate supervision and training necessary for performing the job duties.
- Provide a description of duties the participant will be expected to perform, including the frequency of the activities.
- Complete IMPACT attendance and evaluation forms and provide them at least monthly to the local IMPACT office.

2540.10.30.10

DETERMINING CWEP PARTICIPATION HOURS

CWEP hours can be stacked with part-time employment. Hours are separated per activity and the number of hours included in the weekly participation requirement may not be less than the hours determined by the CWEP formula, less the number exceeds the weekly "core" requirement and should be clearly explained in case.

For TANF recipients, child support collected by Indiana is included in determining the maximum number of participation hours. The formula below must be used to calculate the maximum number of monthly participation hours:

- Determine the amount of child support received by IV-D in the prior month even if the family was not on TANF in that month.
- Arrearage and/or excess child support payments and collections recorded in the Eligibility System in the calculation.
- Do not include current child support payments received by the family which were used to calculate the AG's TANF grant when determining the amount of the prior month's child support. (Check the Eligibility System for current child support collections.)
- Subtract this prior month's amount of child support collections from the AG's current TANF grant.
- Add this amount to the AG's monthly SNAP allotment. If an ineligible TANF individual is included in the SNAP AG, the SNAP benefits must be pro-rated to exclude both the individual and their SNAP benefits before adding the (new) monthly SNAP allotment to the CWEP calculation.
- Divide the result by the federal minimum wage to obtain the monthly participation requirement.
- To obtain the "weekly" hours of participation, divide the monthly amount by five (5) and round down to the nearest whole number.

TANF recipients may not volunteer for additional CWEP hours and should not be scheduled participation for more than the number of hours determined by the above formula. Ways reduced CWEP hours can be fulfilled, single and 2-parent AG's, include:

- Child under 6 TANF AG required 20 hours of weekly participation and CWEP formula exceeds 20 hours, the participant will be complying when participating for a weekly average of 20 hours.
- One-parent AG required 30 hours or 50 hours for mandatory two-parents of weekly participation and CWEP formula exceeds hours, the participant(s) will be complying when participating average required hours.

When both parents in a Two-Parent TANF AG are required to participate, the hours determined by the formula described above are to be allocated among those AG members. Employment takes precedence over other work activities, if one parent is employed, the CWEP hours are assigned to the other AG parent.

Deeming CWEP hours, when the CWEP formula results in less than the required 20, 30, or 50 hours, the weekly "core" activity requirement is considered to have been met using the hours from the CWEP formula (rounded down). The hours remaining up to the core weekly requirement are then deemed with the following exceptions:

- If a single parent AG is required to participate 30 hours per week and the CWEP formula results in less than 20 hours, the hours remaining up to the 20 mandated core hours are deemed. The remaining 10 hours must be assigned to another core or non-core activity.
- If the CWEP formula results in more than the 20 mandated core hours, but less than the required 30 hours, the individual is to be scheduled for the total number of CWEP hours. The remaining hours needed to achieve an average of 30 hours per week must be assigned in another core or non-core activity.

When a CWEP placement is stacked with another activity, the CWEP hours take precedence over the weekly hourly requirement of the other activity. However, unsubsidized employment will have priority over participation in any other work-related activity.

For SNAP AG's only, monthly participation hours in voluntary Community Work Experience (CWEP), are based on the AG's monthly SNAP allotment divided by the federal minimum wage rounded down to the nearest whole number. Weekly hours are obtained by dividing monthly hours by the number of weeks in a month, determined by the number of Wednesdays, rounded to the nearest quarter of an hour.

Counting CWEP participation hours, actual hours of participation in each activity must be recorded daily on Record of IMPACT form and must be submitted to IMPACT case manager weekly, due date indicated on the Self-Sufficiency Plan (SSP), and/or at the completion of each CWEP assignment.

2540.10.35 WORK EXPERIENCE PROGRAM - WE (S)

Work Experience is a work component designed to improve the employability of participants through actual work experience and/or training and to enable them to move into regular employment. Assignments may not replace the employment of a regularly employed individual and must provide the same working conditions provided to regularly employed individuals performing comparable work for comparable hours.

Work Experience may include activities such as on-the-job training, pre-apprenticeship, or apprenticeship placements. The following criteria is to be considered in developing components:

- On-the-Job Training:
 - A work placement made through a contract with an employer or registered apprenticeship program sponsor in the public, private nonprofit, or private sector.
- Pre-Apprenticeship/Apprenticeship:
 - Programs, directly linked to an apprentice program, provides individuals with the basic and technical skills necessary to enter an apprenticeship program.
- Internship or Work Experience:
 - Planned, structured learning experience that takes place in a workplace for a limited period.

Work Experience sites are developed by IMPACT Office staff and approved by the Division of Family Resources. Providers must also comply with the daily supervision and attendance requirements and all other conditions outlined in the Work Experience Agreement between the IMPACT Office and the employer.

SNAP Work Experience placements may be with private for-profit as well as public sector entities, and have a 20-hour weekly work requirement, or 80 hours per month. Participants must be monitored weekly; job performance is to be evaluated at least monthly or as needed. Actual participation hours are recorded on RECORD OF IMPACT ATTENDANCE form and sent to the IMPACT case manager at least monthly and recorded in the System of Record (SOR).

Self-Sufficiency Plan (SSP) review for participant must be completed after three (3) months to determine if the employer intends to hire the individual within the next 60 days. If the employer expresses an intent to hire the participant within three (3) months or less, the placement may be extended for up to nine (9) months. If not hired, the participant is to be placed at another Work Experience site, or in another activity.

Calculating participation hours:

- Calculation of monthly participation hours are the same as SNAP CWEP formula.
- If calculated hours total less than 20 per week, ABAWDs may volunteer to supplement Work Experience with additional hours either in Work Experience alone, or in combination with another countable activity, to meet the work requirement of 20 hours per week for a total of 80 hours per month.
- If more than one AG member is required to participate, hours may be apportioned amount those AG members but may not exceed the maximum number of hours determined by the formula.

SNAP benefits received by the participants are not considered wages, nor are participants considered to be employed.

2540.10.40 COMMUNITY SERVICE PROGRAMS (C)

Community Service Programs are structured programs in which TANF recipients perform work that directly benefits the community through the support of public or nonprofit organizations. Currently, VISTA, AmeriCorps, and State programs.

Self-initiated community service activities must be approved by IMPACT Office staff to determine if the activity and service site can comply with the daily supervision attendance requirements and other conditions outlined in the Community Service Agreement between the IMPACT Office and a Community Service provider.

Calculating participation hours:

- Calculation of weekly participation hours are calculated by CWEP formula.
- Participation recorded on attendance and/or activity log, sent at least monthly to IMPACT case manager to be recorded in IMPACT SOR and participants are supervised daily.

2540.10.40.05 VOCATIONAL TRAINING (S)

Vocational Training includes short-term educational programs where individuals prepare for employment in current or emerging occupations requiring training. The training may last from a few weeks up to a maximum of twelve months. Trainings must be accredited or licensed by the appropriate State agency. Educational institutions must be approved for Federal and State grants. Privately owned vocational and trade schools that do not serve the general public are not subject to accreditation by the Commission on Proprietary Education.

There must be reasonable expectation of new or upgraded employment resulting from the training documented in the Self-Sufficiency Plan (SSP). Vocational Training includes, but are not limited to the following:

- Licensed Practical Nurse (LPN)
- Data Entry Operator
- Auto Mechanic
- Welder
- Certified Nursing Assistant (CAN)
- Dental Assistant

Counting participation hours:

- The total number of weekly course credits plus allowable class time reported and verified on the Client Attendance Report, are countable and can include up to one hour of unsupervised homework time for each hour of class time if advised or required by the instructor.

All educational institutions of Vocational Training must be in-state and public. Exceptions may be made for out-of-state or private institutions when an extenuating circumstance exists or a participant who lives in a county which borders another state. The institution and participant must agree to provide attendance records on the appropriate State Form, and grade reports at specified intervals.

IMPACT will not pay for supplies such as notebooks, paper, pencils, pens, briefcases, or clothing.

All Vocational Training programs must be approved by the IMPACT supervisor, case manager, or a designee, in writing affirming:

- the local job market offers employment opportunities in training that the participant is requesting; and
- the participant appears to have the motivation and aptitude to complete the training.

2540.10.45 JOB SKILLS TRAINING PROGRAM - JST

Job Skills Training (JST) Program, funded by the Family and Social Services Administration (FSSA), is available to TANF recipients, SNAP IMPACT volunteers and ABAWD E&T participants who in general have shown they are highly motivated to succeed.

The type of training offered must be cost effective relative to comparable trainings available, is determined by the demands of the local job market and the expectation of employment immediately following the completion of training or soon thereafter. Additional criteria are outlined below.

Funding for individual participants is dependent upon the availability of funds and the following Hierarchy of Need in which priority is given to participants who:

- Lack both job skills and experience in areas of high demand for labor.
- Have barriers to employment but are otherwise job ready.
- Have limited job skills and need additional training to advance to a higher level.

In addition to complying with the requirements of their Self-Sufficiency Plan (SSP), lacking job skills and experience in areas of high demand, and have completed the FSSA Funded Job Skills Training Procedures and Checklist, which includes the following:

- A high school diploma, GED certification or HSE diploma.
- Expressed an interest and commitment in improving their employment preparedness.
- Completed a Career Assessment to determine their aptitude and career interests.
- Complete 5-day Job readiness workshop (20 hours) or 30 days of job search

If selected for this Job Skills Training Program, the course of study must be State of Indiana approved (DWD/WIOA) as well as:

- Consistent with the interests and aptitude indicated on the Career Assessment.
- In an area of the local job market with employment opportunities.
- Within an acceptable commuting distance from the participant's residence.
- If eligible, participants must apply for Financial Aid such as Pell Grants, etc.

IMPACT Policy will review, pre-approve, and make a determination on all submitted training requests. Approved trainings must be documented in case notes.

The training may not exceed sixteen (16) weeks and may include post-secondary certificate programs consisting of several short-term classes required for certification or licensure.

Counting Job Skills Training Hours:

- **TANF and SNAP recipients** must track "actual time" spent in JST activities.
- Hours are to be recorded on the Client Attendance Report; signed and dated by instructor; and
- submitted to case manager weekly.
- Participants may report classroom hours plus homework time, if applicable, or "hours only."

When course credits are assigned to short term skills training and certification programs, the total number of weekly homework hours required or advised in writing by the instructor/trainer, may not exceed the scheduled weekly course credits or class hours, and participants must maintain a "passing grade" according to the standards of the institution providing the training.

Participants who fail to complete their FSSA Funded Job Skills Training assignment may be subject to a case review to determine their eligibility for future training.

2540.10.50 VOCATIONAL EDUCATIONAL TRAINING (C)

For TANF, Vocational Educational Training (12-month lifetime limit per individual) refers to short-term educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training. The training may last from a few days or weeks up to a maximum of twelve months and must be accredited or licensed by the appropriate State agency and be approved for federal and State grants.

Prior to approving Vocational Educational Training, the IMPACT case manager must determine if there is a reasonable expectation of new or upgraded employment in current or emerging occupations requiring training and document this in the SSP.

Recipients who have used their 24-month time limit for cash benefits, may participate in Vocational Educational Training if they have an open TANF case and are cooperating with IMPACT requirements.

Vocational education training is a core activity in which total weekly course credit hours and allowable unsupervised study time can be used to meet required weekly participation. Hours must be verified and submitted on the client attendance form.

The participant has and must continue to make satisfactory progress in the institution, school, or course. Satisfactory progress is defined as maintaining at least a "C" average or its equivalent at the educational institution or facility.

If the training is provided in an educational institution, Vocational Educational Training must be in-state and public. Exceptions may be made for out-of-state or private institutions when an extenuating circumstance exists.

IMPACT will not pay for supplies such as notebooks, paper, pencils, pens, briefcases, or clothing that is part of the client's normal wardrobe.

The institution and participant agree to provide attendance records on the appropriate State Form, and grade reports at specified intervals.

All Vocational Educational Training programs must be approved by the IMPACT case manager, or a designee, in writing affirming that:

- The local job market offers employment opportunities in the area in which the participant is pursuing training.
- The participant has the motivation and aptitude to complete the training.
- The training is likely to result in employment.

2540.10.55 SELF-INITIATED VOCATIONAL TRAINING (C)

Participants who are already attending an institution of higher education or a Vocational Training Program when they become mandatory for TANF are considered to be in Self-Initiated Vocational Training.

An Assessment and Self-Sufficiency Plan must be completed for a self-initiated participant to determine the appropriateness of the Vocational Training activity and what assistance the participant may need to successfully complete the training.

2540.10.60 DISTANCE LEARNING (C)

Distance Learning includes Vocational Educational Training performed off-site via the internet or correspondence. Distance Learning is subject to the same reporting requirements as on-site educational activities.

Counting participation hours:

- Participants may receive one hour of credit per week for unsupervised study for each course credit.
- Homework required in writing by the instructor, may not exceed the predetermined amount.
- Hours may reflect less than, but no more than, the weekly scheduled hours recorded in the SOR. Accumulated study hours may not carry over.

2540.10.65 EDUCATIONAL (ACADEMIC) ACTIVITIES

Educational/Academic activities includes:

- High School Equivalency Diploma (HSE),
- High School (HS),
- Adult Basic Education (ABE), and
- English as a Second Language (ESL).

High School and HSE preparation are “core” activities for TANF recipients aged 19 and under who are heads of household but are “non-core” activities for TANF recipients aged 20 and older.

For ABAWDs, when Supervised Job Search is combined with the above Educational (Academic) Activities, it must comprise less than 50% of the 20 hours per week work requirement.

2540.10.65.05 HIGH SCHOOL EQUIVALENCY DIPLOMA - HSE

High School Equivalency (HSE) test preparation is defined as classroom instruction to assist a participant who has not graduated from high school to obtain the HSE Diploma. The test measures the individual’s level of achievement relative to that of graduating high school seniors as well as readiness for college and the workforce. It is available in paper-and-pencil form and on-line.

Upon completion of HSE classes, and meeting all local and state requirements, the participant will take the HSE test. Individuals who pass the test will receive a High School Equivalency Diploma.

The participant must provide justification that the individual is prepared to take the test and obtain pre-approval from IMPACT supervisory staff to pay the fee. The HSE test fee is a one-time only (lifetime) payment regardless of whether the individual passes or fails the test.

Once the test has been administered, the test center will provide the IMPACT Office with verification of the testing date and scores.

Participants must record and instructors must verify participation on RECORD OF IMPACT ATTENDANCE, for every hour of class time for every day of every month. Countable hours include supervised study activities and up to one hour of unsupervised homework time for each hour of

class time if advised or required in writing by the instructor. Attendance and excused absences must be recorded in the System of Record (SOR).

2540.10.65.10 HIGH SCHOOL

High School (or secondary school attendance) is defined as credit for classes needed by a participant to obtain a high school diploma. Instruction is provided at a secondary school. The schedule of classes and hours of participation are known to the IMPACT case manager prior to approval of the activity and are documented in the individual's Self-Sufficiency Plan. High school attendance is considered a "core" activity for TANF recipients aged 19 and under who are heads of household.

Counting participation hours:

- There is no hourly participation requirement for a teen parent/caretaker aged 19 and under who is satisfactorily attending high school.
- The number of participation hours is obtained from verified school attendance records.
- Daily attendance must be reported at least monthly to the IMPACT case manager.
- For the hours to be counted, the individual must maintain at least the minimum passing grade required for receiving a high school diploma.
- Educational activities, hours of attendance, and excused absences are to be recorded in the System of Record.

For ABAWDs, when HSE preparation does not meet the 20 hours per week work requirement and is combined with Supervised Job Search, Supervised Job Search activities must comprise of less than half (<50%) of the 20 hours.

2540.10.65.15 ADULT BASIC EDUCATION - ABE

Adult Basic Education (ABE) is educational training directly related to employment. Instruction is designed to improve a participant's reading and math skills (at least to an 8.9 grade level) and enhance basic academic and life skills competencies. ABE classes are offered to adult participants who:

- Are non-high school graduates who score in the low range on math and reading evaluations.
- Need further education to enter a specific occupation, obtain employment, or accept an offer of employment.
- May have a diploma or equivalent but may need remedial instruction in a given area to be employable.

Counting participation hours:

- Participants must record, and instructors must verify actual hours of participation on RECORD OF IMPACT ATTENDANCE form, for every day of the week in each month.
- Countable hours include supervised homework and study activities and up to one hour of unsupervised homework time for each hour of class time if advised or required in writing by the instructor.

- Total unsupervised homework hours may not exceed the number of hours required or advised for the educational program.
- Client must also attain a “passing grade,” or its equivalent, according to the standards set by the educational institution.
- Attendance and excused absences are to be recorded in the SOR.

2540.10.65.20 ENGLISH AS A SECOND LANGUAGE - ESL

English as a Second Language (ESL) is defined as instruction in English for those whose native language is not English. These participants need assistance with speaking, reading, writing, and comprehending the English language.

Counting participation hours:

- Participants may need assistance from the instructor to record actual hours of participation on RECORD OF IMPACT ATTENDANCE form, for every day of the week in each month.
- Countable hours consist of supervised homework and study activities verified by the instructor, and up to one hour of unsupervised homework for each hour of class time if advised or required in writing by the instructor.
- Total homework time cannot exceed the hours required or advised by the education program.
- Client must attain a “passing grade” or its equivalent according to the standards established by the educational institution.

2540.10.70 ON-THE-JOB TRAINING – OJT (C)

On-the-Job Training (OJT) is defined as training in the public or private sector provided to a paid employee while engaging in productive work to gain the knowledge and skills essential to the full and adequate performance of the job.

The training is:

- Supervised.
- Occupational specific.
- Provided for a specific period of time.
- Under a contractual agreement.

The following criteria and procedures apply to TANF IMPACT funded OJT’S:

- The participant’s current skill level, work experience, interests, prior trainings, education, and aptitude are assessed to determine the appropriateness of an OJT activity.
- To the extent possible, an OJT activity must relate to the participant’s interests and abilities.

An OJT contract may only be written with an employer who:

- Is providing full-time, permanent, long-term employment.
- Agrees to contact the IMPACT case manager for assistance in helping alleviate any problem(s).

- Will provide Worker’s Compensation or the equivalent to cover medical care for on-the-job injuries and provide accident (tort claim) protection for on-site injury.

An IMPACT case manager must:

- Establish and submit an OJT marketing strategy to Central Office IMPACT containing the types of jobs that will be marketed, and the qualitative measures for making good or satisfactory progress.
- Monitor the OJT contracts monthly and complete the ON-THE-JOB TRAINING REVIEW.
- Document to ensure that each client placed in an OJT training is:
 - Making satisfactory progress.
 - Provided with the skills outlined.
 - Able to resolve problems which affect the job.
 - The training completed by the designated date.
 - The participant is obtaining the same wages and benefits as similarly situated employees or trainees and are working the hours designated on the contract.

Prior to the development of the OJT, the contract must be approved by IMPACT Central Office have signatures of the applicable state agencies and Include Attachment A Record of client data.

The length of training may not exceed 130 day/26 weeks.

Contracts can be extended due to paid holidays, scheduled plant shutdowns, and sick leave. However, actual training time cannot exceed 130 days/26 weeks.

To determine the maximum number of days/weeks of training for a specific occupation, the following steps must be followed:

- The employer must provide a job description in writing.
- The Dictionary of Occupation Titles (DOT) must be used to determine the skill level of the job description by matching the description with the occupational title and nine-digit code number assigned to that title.

Transfer the Specific Vocational Preparation (SVP) into training maximum days/weeks by following the formula below:

SVP LEVEL CODE MAXIMUM DAYS/WEEKS	
1-2	30 DAYS/6 WEEKS
3	45 DAYS/9 WEEKS
4	90 DAYS/18 WEEKS
5-6	130 DAYS/26 WEEKS

When determining actual number of days/weeks the following must be considered:

- The number of days/weeks that the employer states it will take to train a person in the job.
- The TANF participant’s knowledge of several tasks outlined in the training plan.
- The TANF participant’s capability to perform the job.
- The maximum number of days/weeks for the SVP level.

Payments to an employer for OJT shall not exceed an average of 50% of the wages paid by the employer to the participant during the period of such training. The average maximum percentage of wages to reimburse the employer depends on the skill level of the specific occupation. The IMPACT case manager may negotiate the contract for a lower reimbursement rate.

SVP LEVEL CODE	MAXIMUM REIMBURSEMENT
1/2	25%
3	35%
4-5	50%

An employer may not be reimbursed for hours that the participant did not work such as paid holidays, vacations, sick leave, etc., or for hours that exceed 40 hours a week.

The employer will submit monthly:

- A letter on company letterhead detailing the name, social security number of the participants, the total reimbursement for the OJT, the number of hours worked, total wages, the reimbursement rate and the wages being reimbursed for each.
- The payroll record for each participant.
- The attendance record for each participant.
- The appropriate State claim-voucher.

The employer must provide the participant a copy of the "Benefits and Grievance Procedures," specific rules and regulations by which the client is expected to abide, and a copy of the training program.

Wages paid to a participant in an OJT will be considered earned income.

If a participant becomes ineligible for TANF benefits, the individual will remain an IMPACT participant for the duration of the OJT contract and will be eligible for all appropriate IMPACT supportive services. The employer remains eligible for reimbursement of the training cost for the duration of the original OJT contract.

No SNAP IMPACT funding (including supportive services) can be utilized. If non-IMPACT funding is available, the service provider may locate and write a contract with an employer for a specific job. The contract must contain at a minimum:

- Job duties
- Wages to be paid, (at least federal minimum wage)
- Hours to be worked
- Length of the training
- Non-displacement language
- The length of the contract may last from one (1) to six (6) months.

Counting OJT participation hours:

- The number of actual participation hours is determined by written documentation from the employer through pay stubs or other employer-produced documents substantiating the hours worked and are to be recorded in the appropriate automated systems.

2545.00.00 NON-COMPLIANCE WITH TANF IMPACT PROGRAM REQUIREMENTS (C)

IMPACT Non-compliance applies to the individual's failure to comply with IMPACT without good cause and can result in a sanction, loss of benefits and discontinuance of supportive services. At application, non-compliance can result in application denial.

The following actions constitute non-compliance and can result in a sanction and AG closure:

- Failure to attend a scheduled Orientation/Assessment Interview.
- Failure to attend a scheduled Self-Sufficiency Plan development appointment.
- Failure to provide required documentation of participation in assigned IMPACT activities.
- Failure to participate 100% in any assigned IMPACT activity.
- Refusal or failure to attend a scheduled job interview.
- Refusal or failure to seek, accept, and maintain employment at 20 hours or more per week at minimum wage or higher.
- Refusal or failure to cooperate with any other service agency to which referred through the IMPACT Program.

Once non-compliance date is entered into SOR, non-compliance with IMPACT requirements will result in:

- A "Notice of Non-Compliance with IMPACT Requirements", generated by SOR, will be mailed.
- An applicable minimum sanction period is initiated on the same day.

The Notice of Non-Compliance gives the deadline for the participant's good cause response which is thirteen (13) calendar days from the date the notice is mailed. If the 13th day falls on a weekend day or holiday, the deadline is the first working day after the weekend or holiday. If the participant:

- Responds in writing with good cause by the deadline stated on the Notice, the sanction is to be deleted in the Eligibility System.
- Responds by the deadline but good cause is not approved, client is to be notified that the good cause documents provided did not meet requirements.
- Fails to respond by the deadline stated on the Notice and does not have good cause, the individual must serve the minimum sanction period and demonstrate compliance, whichever is later.
- Fails to respond by the deadline stated on the Notice because of unusual or extraordinary circumstances, and provides good cause later, the sanction is to be deleted in the Eligibility System.

IMPACT Compliance Requirements; the sanctioned individual must:

- Re-apply for TANF Cash Assistance.
- If determined mandatory for IMPACT participation, complete Applicant Job Search (AJS) Orientation, and participate successfully in AJS activities. Minimum of 6 employer contacts, 3 of which have to be applications.
- At re-application, if the sanctioned individual is determined mandatory for IMPACT participation and is serving, or has served, the minimum penalty period and completes

the AJS requirements, the sanction will be end-dated using the date of the last day of the month of application, or the end of the minimum sanction period, whichever is later.

- Sanctioned individuals should not re-apply for TANF benefits prior to the last month of the minimum sanction period.

When TANF IMPACT mandatory individuals do not comply with IMPACT Program requirements:

- A Notice of Non-Compliance with IMPACT Requirements is generated by the System when the failure date of the participant's non-compliance is entered in the SOR.
- The applicable minimum sanction period is initiated simultaneously.

The Notice of Non-Compliance gives the deadline for the participant's good cause response which is thirteen (13) calendar days from the date the notice is mailed. If the 13th day falls on a weekend day or holiday, the deadline is the first working day after the weekend or holiday. If the participant:

- Responds in writing with good cause by the deadline stated on the Notice, the sanction is to be deleted in the Eligibility System.
- Responds by the deadline but good cause is not approved, client is to be notified that the good cause documents provided did not meet requirements.
- Fails to respond by the deadline stated on the Notice and does not have good cause, the individual must serve the minimum sanction period and demonstrate compliance, whichever is later.
- Fails to respond by the deadline stated on the Notice because of unusual or extraordinary circumstances, and provides good cause later, the sanction is to be deleted in the Eligibility System.

2545.05.00 CASE MANAGER RESPONSIBILITIES FOR NON-COMPLIANCE (C)

It is the responsibility of the IMPACT case manager to ensure:

- Non-compliance information is reflected in the SOR and ensuring that the applicant's status is accurately displayed in the Eligibility System as "N" for non-compliance.
- Determine Level I good cause when a TANF recipient fails to comply with an assigned IMPACT activity.

2545.10.00 IMPACT GOOD CAUSE DETERMINATION (C)

The policy stated in this section applies only to Two-Parent TANF and Regular TANF Assistance Groups (AGs).

A determination that good cause exists for non-compliance with IMPACT Program requirements shall be made in accordance with the process described in Section 2545.10.05.

For occurrences of non-compliance with the Self-Sufficiency Plan (SSP) which are not related to Voluntary Quit or Reduction of Hours/Earnings, good cause reasons are limited to the following:

- The required actions were beyond the capability of the participant to perform, or the circumstances were beyond the individual's ability to control, such as childcare for child under age 6, transportation breakdown with no alternative, illness or hospitalization

verified by licensed medical professional, victim of domestic violence, family crisis or other unusual circumstances.

- The agency failed to provide participant with services needed to perform the required actions.

For occurrences of non-compliance with the requirements of the SSP related to voluntarily quitting employment (Voluntary Quit), good cause reasons include:

- A substantiated incident of discrimination by any employer based on age, race, sex, color, handicap, religious beliefs, national origin, political beliefs, or marital status.
- Work demands or conditions that render continued employment financially unacceptable, such as working without being paid on schedule.
- Leaving a job in connection with patterns of employment in which workers frequently move from one employer to another, such as migrant farm labor or construction work.
- The individual quit, with the approval of the IMPACT case manager, to accept a bona fide job offer that resulted in increased earnings and/or benefits.
- The individual was unable to obtain or maintain necessary care for a minor child residing in the home.
- The employment site violated applicable state or federal health and safety standards.

For occurrences of non-compliance with the requirements of the SSP by voluntarily reducing earnings (Reduction of Hours/Earnings), good cause exists if the reduction was due to the inability to obtain or maintain necessary care for a dependent minor child residing in the home.

2545.10.05 IMPACT GOOD CAUSE DETERMINATION PROCESS – LEVELS OF AUTHORITY (C)

The Levels of Authority cited below for determining good cause for non-compliance with IMPACT Program requirements have been established to minimize the occurrence of situations that may require a good cause determination.

A determination that good cause exists for failing to cooperate with IMPACT Program requirements is limited to the following two (2) reasons:

- The required actions were beyond the capability of the individual to perform, or the circumstances were beyond the individual's ability to control.
- The agency failed to provide the services needed for the individual to perform the required actions.

Actions of non-compliance requiring a good cause determination include, but are not limited to, the following:

- Refusal or failure to comply with any IMPACT Program requirements.
- Refusal to accept employment.
- Termination of employment.
- Reduction of employment hours.

Levels of Authority for Determining Good Cause for Non-Compliance include IMPACT case managers, supervisory and administrative staff.

IMPACT case managers have authority to grant a first request for good cause for the following reasons:

- Lack of childcare for a child under age 6.
- A breakdown in transportation arrangements with no ready access to alternative transportation.
- Actions of non-compliance resulting in refusal.
- Failure to comply with IMPACT Program requirements.
- The case manager must document efforts to eliminate barriers to participation that may have been addressed in the SSP or may not have been a barrier prior to the first occurrence.

Supervisory have authority to grant a second request for good cause reasons stated under the Case Manager Level I, and a first request for the following reasons:

- Refusal to accept employment.
- Termination of employment.
- Reduction of employment hours.
- Unsafe employment situations.
- Illness or hospitalization of the participant verified by a licensed medical professional.

Administrative have authority to grant a third request for good cause for reasons listed under the Case Manager Level I, a second or third request for the reasons listed under the Supervisory Level II, and a first, second or third request for the following reasons:

- Domestic violence.
- Family crisis.
- Other circumstances alleged by the participant to be beyond their ability to control.

The IMPACT case manager should be informed of good cause determination decision within two working days of receipt of request for good cause.

2545.15.00 SANCTION FOR IMPACT NON-COMPLIANCE (C)

A Non-Compliance sanction is initiated when an IMPACT participant is found non-compliant with IMPACT. For a Two-Parent TANF AG, a third sanction by either individual, can lead to a lifetime disqualification from the TANF Program for the entire AG.

A sanction may not be initiated if a participant requests a voluntary withdrawal (VW) from TANF prior to the individual's "Notice of Non-Compliance" form is generated. The VW takes precedence and may be verbal or written. All staff should assist the individual in the VW process and ensure that the request is recorded in the SOR.

2545.15.05 IMPACT SANCTIONS (C)

The policy stated in this sub-section affects only the IMPACT mandatory Two-Parent TANF and Regular TANF Assistance Groups (AGs).

IMPACT participants will have their AG closed if they fail or refuse, without good cause, to:

- Attend a scheduled Orientation Workshop
- Complete a Self-Sufficiency Plan Assessment Interview and cooperate in developing a Self-Sufficiency Plan (SSP)
- Comply with the participation requirements set forth in the Comply with IMPACT requirements.
- Failure to cooperate with IMPACT requirements will result in a Notice of Non-Compliance with IMPACT Requirements, and the initiation of a Full Family Sanction on the same day.

The only exception would be if the participant has requested a Voluntary Withdrawal (VW) before the Notice of Non-Compliance is generated. A sanction may not be initiated if a participant requests a voluntary withdrawal (VW) from TANF prior to the individual's "non-compliance." The VW takes precedence and may be verbal or written. All staff should assist the individual in the VW process and ensure that the request is recorded in the SOR.

Minimum sanction periods will apply to non-compliant TANF IMPACT participants who do not have good cause:

- First occurrence:
 - Loss of TANF Cash Assistance (CA) and eligibility for supportive services for the entire AG for a minimum of one (1) month, or until the sanctioned individual demonstrates compliance.
- Second occurrence:
 - Loss of TANF Cash Assistance and eligibility for supportive services for the entire AG for a minimum of three (3) months, or until the sanctioned individual demonstrates compliance, whichever is later.
- Third occurrence:
 - Lifetime disqualification from the TANF Program for the entire Assistance Group, and any subsequent AG in which the sanctioned individual(s) is either the case head or a member.

Two-Parent TANF AG's:

While each parent is allowed the first two (2) sanction occurrences, the first parent to incur the third sanction will initiate a lifetime disqualification from the TANF Program for the entire Assistance Group, regardless of whether the other parent has ever been sanctioned.

The Notice of Non-Compliance with IMPACT Requirements also provides the individual with the opportunity to show good cause for the non-compliance.

If good cause for the non-compliance exists, the sanction will be deleted in the Eligibility System. The client should be re-engaged immediately when the good cause reason is no longer applicable.

- If good cause for the non-compliance does not exist, the minimum penalty period must be served:
 - If the individual re-applies and demonstrates compliance by completing Applicant Job Search (AJS) Orientation and 6 contacts, 3 of which are required to be applications while serving the minimum penalty period, the sanction will be ended in the Eligibility System using the date of the last day of the minimum sanction period, or the last day of the month of re-application, whichever is later.

- If the individual re-applies after serving the minimum penalty period, and demonstrates compliance by completing all AJS requirements, the sanction will be end-dated using the date of the last day of the month of re-application. If the individual does not complete all AJS requirements, their application will be denied.

The individual should not re-apply for TANF prior to the last month of the minimum penalty period.

2545.20.00 NON-COMPLIANCE OF SNAP ONLY RECIPIENTS (S)

SNAP IMPACT volunteers who do not comply with their SNAP IMPACT requirements will be removed from the IMPACT Program without loss of benefits or the imposition of a sanction. Their supportive services will also be terminated.

ABAWDs who have exhausted their countable three (3) months of benefits and do not comply with ABAWD work requirements, will lose their SNAP benefits and supportive services for the remainder of the 36-month period. The first three (3) months do not have to be consecutive. If the AG is comprised of more than one member, the case will remain open and the individual's income, resources, and expenses will continue to be included in the SNAP budget.

2550.00.00 IMPACT SUPPORTIVE SERVICES

Supportive services are provided to the individual while participating in IMPACT activities, including employment. Supportive services are provided to help remove barriers that are preventing the individual from moving toward self-sufficiency.

The Self-Sufficiency Plan (SSP) must include the type of supportive services to be provided to the participant. The needs of participants are to be discussed with IMPACT staff and supportive services arranged when the Self-Sufficiency Plan is being developed. Services are to be terminated if attendance for IMPACT activities and compliance with SSP cannot be verified.

Supportive services are provided directly to clients via gas card; bus pass; clothing voucher, etc. Childcare is provided via the state agency that manages CCDF.

If a non-compliant TANF participant fails to provide good cause verification or submit the required attendance form (s) by the due date, supportive services are to be discontinued no later than the last day of the month in which the individual was eligible for TANF benefits.

2550.05.00 ESTABLISHING VENDORS FOR IMPACT SUPPORTIVE SERVICES

The contracted IMPACT provider is responsible for establishing a relationship with vendors to provide supportive services such as interview clothing and uniforms (CA), bus passes and tokens (BU), vehicle repairs (VE), gas cards (GC), and HSE testing (HE).

2550.10.00 PROCESSING SUPPORTIVE SERVICES

The IMPACT case manager will facilitate the provision of supportive services and the appropriate supervisory staff will review and approve the services to ensure compliance with supportive services guidelines.

2550.10.05 CORRECTING DISCREPANCIES IN AUTHORIZED SERVICES

When there is a discrepancy between the authorized services and the services received, the situation must be brought to the attention of the IMPACT case manager and supervisory staff and resolved with the vendor and/or participant. Participants who purchase unauthorized items could be asked to return items or arrange to purchase them with their own funds.

Payment should not be withheld from vendors who have allowed the purchase of unauthorized items or services; a discussion should take place with the vendor to emphasize the importance of providing only those services and items that are allowed and approved. If a vendor persists in providing unauthorized services or allowing unauthorized items to be purchased, the relationship should be terminated.

2550.10.10 AVOIDING SUPPORTIVE SERVICES PAYMENT ERRORS

All authorizations for supportive services for IMPACT participants must follow the guidelines and dollar limits listed in Sections 2550.20.05, 2550.20.10, 2550.20.10.05 and 2550.20.15. In the dollar maximum statement for each category of supportive services, “per a 12-month period” is defined as 12 months from the initial expenditure under each category. A subsequent 12-month period for a category begins when a new expenditure occurs, not immediately after the first 12-month period ends (also called a “rolling” 12- month period).

2550.20.00 IMPACT SUPPORTIVE SERVICES LIMITS

The limits designated for each category of service described below are the same for both the TANF and SNAP programs unless otherwise noted.

TANF recipients who receive TANF and SNAP benefits concurrently, are not eligible for the supportive service limits in each category under both programs.

For SNAP recipients the Federal Food and Nutrition Service (FNS), supports the use of Federal SNAP Employment and Training (E&T) funds to provide training and educational activities to assist SNAP IMPACT participants in becoming employed.

SNAP recipients who obtain employment while participating in IMPACT may now receive clothing and transportation assistance, if needed, up to a maximum of 90 days from the begin date of their employment unless they lose eligibility for IMPACT services because of:

- Case closure.
- Removal from IMPACT.

Both TANF and SNAP participants are subject to a rolling 12-month period for each category of assistance.

Supportive services are not provided to self-employed participants.

SNAP participants are limited to a combined monthly total of \$175 for supportive services (excluding Dependent Care).

The total dollar amounts received by the participant in each category for a rolling 12-month period is recorded in the System of Record and reflect supportive services paid under both programs.

2550.20.05 SNAP ONLY RECIPIENTS (S)

Only SNAP volunteers and ABAWDs that are participating in IMPACT, are eligible for IMPACT supportive services in the following categories and amounts up to the monthly maximum of \$175 for all services combined:

- Clothing (CA):
 - Up to a maximum of \$300 per 12-month period not to exceed \$175 per month for dress clothing, uniforms, and shoes, if needed, to attend a job interview, begin and maintain employment up to a maximum of 90 days after the job begins, or participate in an assigned IMPACT activity requiring specific clothing such as uniforms, scrubs, steel-toed shoes or boots, safety glasses, or other safety attire. Accessories such as belts, gloves, undergarments, hosiery, cosmetics, jewelry, and other employment related expenses are not allowable.
- Transportation services (BU, GC):
 - Services may be authorized if needed to help the client find employment or participate in an assigned IMPACT activity.
 - Public transportation (BU) may be provided up to the \$175 maximum per month.
 - Private transportation (GC) services provided by the client, friends, or relatives, and paid with a gas card (GC) may be authorized up to a maximum monthly amount of \$175. Mileage must be documented.
- Car Repair: Maximum of \$500 for lifetime
- High School Equivalency (HSE) Diploma (HE) is a one-time only (lifetime) payment up to a maximum of \$90 for a participant to take the HSE test regardless of whether the individual passes or fails the test. The individual must provide justification that the individual is prepared to take the test before payment can be approved.
- Drug testing: Will pay for drug testing needed to obtain employment. Maximum of \$75 annually
- Driver's license: One time only per participant if reasonably necessary
- Birth Certificate: \$40 One time only per participant
- Background check: \$20 annually per participant if needed to obtain employment

Other supportive services may be offered through one of our third-party partners, these are listed in our most current employment and training plan. Full list can be requested from IMPACT policy if needed.

2550.20.10 TANF IMPACT MANDATORY PARTICIPANTS (C)

TANF IMPACT mandatory participants are eligible for supportive services in the following categories and amounts:

- Clothing (CA):
 - Up to \$300 per 12-month period per participant for dress clothing, uniforms, scrubs, steel-toed boots, and shoes if needed to attend a job interview, begin or maintain employment, or to participate in an IMPACT activity. Accessories such as belts, gloves, under garments, hosiery, cosmetics, and jewelry are not allowable.
- Transportation (BU, GC):
 - Services may be authorized, if needed, to help the participant obtain and maintain employment, or to participate in an IMPACT activity. Expenses are projected by using best available information (may include mileage data from MapQuest, Google Maps, or other appropriate sources) shortest distance.
 - Public transportation (BU) may be provided up to a \$200 maximum per month.
 - Private transportation (GC) services provided by the client, friends, or relatives, and paid with a gas card (GC) may be authorized up to a \$200 maximum per month.
- Vehicle Repair (VE) may be authorized up to \$750 per 12-month period per participant only when the vehicle is:
 - Owned or co-owned by the participant, participant's spouse, or participant's parent if the client is under age 21.
 - Licensed with a current plate and registration.
 - Insured.
 - The repair(s) is necessary to make the vehicle operable in order to have transportation to begin or maintain employment, or to participate in assigned IMPACT activities.
 - Public transportation is not available or accessible.
- High School Equivalency (HSE) Test (HE) is a one-time only (lifetime) payment up to a maximum of \$90 for a recipient to take the HSE test regardless of whether the individual passes or fails the test. The individual must provide justification that the individual is prepared to take the test before the payment can be approved.

2550.20.10.05 VEHICLE REPAIR ESTIMATES (C)

ESTIMATES:

- Two (2) free estimates are required for vehicle repair(s). The repair for which the estimate is being requested must be clearly stated. Minimal repairs are to be authorized only for the condition(s) that will make the vehicle operable. All estimates must be pre-approved. A repair cannot be considered or approved if the cost exceeds the maximum amount "allowable" or still "available" to the client during the rolling 12-month cycle.
- Second estimates may be waived if a tow would be required to obtain a second estimate and must be clearly documented in the SOR.

VENDOR REQUIREMENTS

- The vendor must indicate on the VEHICLE REPAIR ESTIMATE Form whether the vehicle is worth repairing based on its age, mileage, and overall condition. The vendor's estimate of worth does NOT preclude further evaluation by IMPACT staff regarding the value of the car relative to the estimated cost of the repair and if the repair is appropriate.

REPAIRS

- Maintenance services will not be covered unless considered integral to repair, for example replacing or repairing a radiator would most likely require replacing the fluid.
- All repairs require prior approval by IMPACT Office staff once verification of ownership, auto insurance, and two estimates containing a statement about the car's worth have been received.
- Any exceptions to having an approved auto repair business complete all repair work must be approved by IMPACT policy.

SERVICES COVERED:

- Minimal vehicle repairs only (battery replacement, tire replacement including balancing, mufflers, brakes, etc.) at a cost of less than \$750. Repairs must be necessary (not desirable) and limited to that service which will make the vehicle operable.

SERVICES NOT COVERED:

- Preventive maintenance services scheduled or otherwise (any fluid changes - oil, transmission, anti-freeze, brake, windshield wiper, etc.).
- Tune ups.
- Alignments.
- Shocks, struts, motor mounts, catalytic converters, tie rods.
- Body work, unless it is absolutely necessary for the safe operation of the vehicle and not covered by insurance.
- Diagnostic fees.
- Major transmission/engine repairs or replacements.
- Insurance premiums.
- License plates or driver's licenses.
- Vehicle down payments/purchases.
- Car payments.

2550.20.15 PRIVATE TRANSPORTATION EXPENSES

TANF and SNAP recipients who are provided with a gas card (GC) to cover travel expenses in order to participate in assigned IMPACT activities must accurately project round trip mileage multiplied by the number of trips. The current mileage rate is \$.65 per mile.

Round trip mileage projections must be reflected in the eligibility system and must include the following addresses, if applicable:

- Client's home
- Childcare site
- Location of the IMPACT activity
- Employment site

Fines for illegal acts such as parking, traffic violations, and driver's license suspension penalties are not to be paid under any category or circumstance.

2550.25.00 TANF IMPACT TRANSITIONAL SUPPORTIVE SERVICES (C)

A TANF IMPACT participant whose assistance group (AG) loses eligibility for TANF benefits due to the participant's employment, may receive assistance with transportation and vehicle repair expenses for up to 90 days. The costs must be necessary and directly related to employment.

- Transportation assistance may be provided up to 90 days after the TANF AG closure date. Limited to \$200 per month, not to exceed \$600 during the 90-day period.
- Vehicle Repair assistance may be provided for up to 90 days after the TANF AG closure date if the vehicle becomes inoperable. Repairs must not exceed \$750 per service year.

2550.30.00 SUPPORTIVE SERVICES FOR INELIGIBLE PARTICIPANTS

No payment for program activities or supportive services may be made for a month in which the participant is/was ineligible for TANF or SNAP benefits except for the following:

- Participants whose 24-months of eligibility have expired, but the individual's TANF AG remains open.
- Participant's TANF AG closes due to employment, but the individual is eligible for TANF IMPACT transitional supportive services.
- Clients who participated in Applicant Job Search (AJS) may be paid for the period in which they participated and former TANF IMPACT participants may be paid for the duration of their OJT contract.

2550.40.00 CCDF CHILDCARE FOR SNAP RECIPIENTS (S)

Funding is established via the annual SNAP E & T plan to provide childcare for eligible children of SNAP recipients who are participating in SNAP E&T. SNAP E&T clients receive priority assistance via CCDF once they leave SNAP due to employment if they meet the CCDF qualifications. SNAP childcare is managed by the childcare agency via intake agents in each county of the state. Payments are based on the age of the child and market rates set for each county based on the type of care (licensed center, licensed home, ministry, and legally licensed exempt).

An eligible child is a recipient of SNAP who is under the age of thirteen (13) when childcare is approved. The parent and child must be in the same assistance group and the parent must be participating in IMPACT.

Childcare is allowable while participating in assigned activities and employment obtained while in E&T services and up to 90 days after becoming ineligible for SNAP.

IMPACT staff is responsible for completing the DFR/CCDF SNAP Referral and sending it via secure email. Due to security requirements, the Referral form is not to be faxed or mailed to the Intake Agent. The intake agent will treat the emailed name of the IMPACT case manager and address as the IMPACT staff's signature.

Complete Referrals include:

- A subsidy period of four (4) weeks.
- Begin Date and Projected End Date noted on the referral.
- Referrals for employment have a limitation of 90 days after the begin date.
- The “General Comments” section of the referral should indicate the required number of weekly hours per week of childcare.
- Upon authorization completion, the Intake Agent should complete the “Notification of Action” section and FAX the Referral Form to the Service Center at 800-403-0864 to be attached to the case.

If all appropriate sections on the Referral are not completed, the referral will be considered incomplete, and the client will be denied services.

2550.40.05 CHOOSING A DEPENDENT CARE PROVIDER (S)

IMPACT staff should discuss the participant’s dependent care needs and provide information on the available resources and what to look for in selecting a provider. The IMPACT case manager will ensure that the necessary childcare is in place prior to participation in the IMPACT Program.

Participants are responsible for choosing an approved dependent care provider and should be made aware that the list of Licensed childcare homes, facilities, and Unlicensed Registered Ministry or Legally Licensed Exempt providers provided is not an endorsement of the quality of the childcare provided.

2550.45.00 CCDF CHILDCARE FOR TANF ELIGIBLE PARTICIPANTS (C)

Priority childcare assistance is available through the Child Care and Development Fund (CCDF) to support approved IMPACT activities of a parent or caretaker who receives TANF assistance. Childcare assistance is provided through subcontractors or “Intake Agents” in different regions throughout the state. Priority is given to families in which the parent or caretaker is TANF IMPACT mandatory. If a family does not qualify for a priority category, they may be placed on a waiting list and will be notified when funds become available.

Parents who are TANF eligible and exempt from IMPACT participation, but in need of childcare assistance, may volunteer for IMPACT. These parents must be made aware that once they volunteer for IMPACT and their childcare barrier is removed, their status will be changed to mandatory and will not change back to “exempt” unless a new barrier or exemption reason applies.

Minor parents who wish to attend high school and whose TANF grant is in their parent’s name, may also volunteer for IMPACT. They also need to know how this status change will affect their 24-month clock. For CCDF purposes, the TANF/IMPACT case must be in the minor parent’s name, not her mother or father’s.

A TANF IMPACT mandatory recipient, who is in an approved IMPACT activity or employed, must be in an active status in the Eligibility System. They must also meet the CCDF “initial” income eligibility standard of 127% (or below) of the Federal Poverty Level (FPL).

Priority childcare services may also be available for a TANF applicant participating in AJS. If childcare is needed, the IMPACT case manager will make a referral to the CCDF Intake Agent.

Once childcare is authorized, the family may continue to receive childcare services until their next re-certification period, which may not be greater than fifteen (15) weeks for TANF recipients, with the CCDF Intake Agent.

The maximum income limit for a family already receiving CCDF vouchers is 170% of the FPL. If the family’s income increases during the CCDF certification period, they may continue to receive vouchers until the Intake Agent recertifies them.

2550.45.05 PRIORITY CHILDCARE REFERRALS (C)

The IMPACT staff is responsible for completing the DFR/CCDF REFERRAL Form and sending form to Intake Agent’s via secure email. Due to security requirements, the REFERRAL form is not to be FAXED or mailed to the Intake Agent. The Intake Agent will treat the e-mailed name of the IMPACT case manager and address as the IMPACT staff’s signature. All appropriate sections on referrals need to be completed. Incomplete referrals will cause the client to denied services. If the “Current TANF benefit amount” section on referral is zero, the worker needs to enter a zero in the field.

A CCDF subsidy for TANF recipients may be authorized for fifteen (15) weeks only. Upon authorization completion, or expiration of a referral, the Intake Agent should complete Section B of the REFERRAL Form and FAX it to the DFR/FSSA Document Service Center to be attached to the case.

2550.45.10 GENERAL COMMENTS SECTION OF REFERRAL FORM (C)

The “general comments” section should indicate whether the client requires more than the customary thirty (30) hours per week of childcare.

2550.45.15 REPORTING CHANGES TO THE INTAKE AGENT (C)

After referral, IMPACT staff is to notify the Intake Agent of changes in activities, employment starts and stops, breaks in participation, and loss of TANF eligibility or Assistance Group (AG) closures via secure E-mail.

2550.50.00 TRANSITIONAL CHILDCARE (C)

TANF participants who are employed and “transitioning off TANF”, client may receive childcare vouchers depending on availability of funds. For CCDF purposes, “transitioning off TANF” means

client's TANF AG is active in the current month but will be closed at the beginning of the upcoming month.