

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

(OMB Control Number: 0970-0145)

A. CONDUCT A PROGRAM DESIGNED TO SERVE ALL POLITICAL SUBDIVISIONS IN THE STATE (NOT NECESSARILY IN A UNIFORM MANNER) THAT PROVIDES ASSISTANCE TO NEEDY FAMILIES WITH (OR EXPECTING) CHILDREN AND PROVIDES PARENTS WITH JOB PREPARATION, WORK, AND SUPPORT SERVICES TO ENABLE THEM TO LEAVE THE PROGRAM, SPECIFICALLY CASH ASSISTANCE, AND BECOME SELF-SUFFICIENT (SECTION 402(A)(1)(A)(I) OF THE SOCIAL SECURITY ACT)

This State plan was developed in accordance with Section 402 of the Social Security Act, as amended by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193). This State plan is submitted as a new plan for the purposes of the state's eligibility for federal funding under part A, Title IV, of the Social Security Act. The information submitted below restates the pertinent requirements of Section 402 and then provides the information that outlines the provisions of Indiana's program.

Indiana Family and Social Services Administration

Indiana's Temporary Assistance for Needy Families (TANF) Plan is administered by the Indiana Family and Social Service Administration (FSSA). FSSA provides a broad array of services to the State including institutional and community-based programs for the elderly and disabled; mental health and addiction services, Medicaid and other health care services and programs, and direct services such as child care assistance, Supplemental Nutrition Assistance Program (SNAP), and cash assistance. FSSA administers the Temporary Assistance for Needy Families (TANF) block grant, which includes TANF cash assistance and other programs funded in whole or in part with TANF or maintenance of effort funds.

Within FSSA, the Division of Family Resources (DFR) has the responsibility for determining TANF eligibility, delivering benefits and employment services. DFR is also responsible for SNAP and enrollment in the Medicaid program. Traditionally, DFR provides TANF cash assistance and employment services at one of its ninety-two county offices or the office of a contracted employment service provider.

Under IC 12-14-1, Indiana defines a 'qualifying family' as means a family meeting the following conditions:

1. The family consists of :
 - a. A pregnant woman,
 - b. Child under age 18 or
 - c. A child between ages 18 and 24 attending secondary or post-secondary school at least half-time
2. The children listed above must reside with a custodial parent or other adult caretaker relative

3. The gross family income must be less than 400% FPL

Each TANF or MOE program must meet these minimum requirements but who is included in the household and how household income is calculated for eligibility purposes varies by each programs' policies, laws and regulations.

STATE PLAN REQUIREMENTS

The following is a description of Indiana's plan for the Temporary Assistance for Needy Families (TANF) Program under Section 402 (a) of the Social Security Act, as amended by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193).

Section 402 (a) (1) OUTLINE OF FAMILY ASSISTANCE PROGRAM

(A) General Provisions

(i) Indiana will transfer a portion of the federal TANF Block Grant to supplement the Child Care Development Fund in addition to funding the following programs:

- TANF Child Care Assistance
- Early Intervention-First Steps
- Healthy Families (A child abuse prevention strategy)
- Father Engagement Programs
- Parent Education Program
- Parenting/Family Functioning Assessment
- Visitation Facilitation
- Tutoring / Literacy Classes
- Community Based Family Preservation Services
- Indiana Kids
- Teen Pregnancy Prevention
- Pregnancy Support Program
- Workforce Development Program Partnerships
- Family Housing Intervention
- TANF and IMPACT

Child Care Assistance

The child care needs for TANF recipients will be funded through use of both the Child Care Development and the TANF block grant. Assistance will be available to support the approved employment and training activities of the parent/caretaker who receives TANF assistance or who would receive TANF except for the imposition of a program sanction.

TANF funds also will be utilized for child care services for parents and relatives who are working and meet the income eligibility criteria of the Child Care Development Funds Program. Child care eligibility is capped at 127% of the federal poverty level.

TANF funds for child care will be blended with those of CCDF and accessed through the CCDF Voucher system. The funding source of child care services will be transparent to the families receiving child care subsidies.

Early Intervention/First Steps

First Steps is Indiana's Part C Early Intervention Program for infants, toddlers and their families. It is a family centered, locally based, coordinated system that provides services to children (0-3rd birthday) who are developmentally vulnerable. Services are intended to prevent or minimize disabilities with the goal of maximizing the potential of these children so that they can function as contributing members of society. Families with income under 250% FPL are eligible for the program. This initiative is reasonably expected to achieve outcomes under TANF Purpose #1: Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.

Healthy Families Indiana

The Healthy Families Program is a voluntary, multifaceted home visitation program designed to promote healthy families and healthy children administered by the Indiana Department of Child Services. Healthy Families Indiana (HFI) provides screening and assessment of families throughout the state identified as at-risk of child abuse or neglect. If the screening and assessment finds physical or mental health issues, HFI provides a referral to WIC Programs, health clinics and local hospitals for services. Services are provided at no cost and include child development, access to health care, parent education, staff training and community coordination/education. The program model includes screening, assessment and home visiting. Services can begin for eligible families either prior to or at the time of birth and can continue until the child is five years of age. This program is open to all Hoosier families regardless of income but TANF state and federal funds will only be used for families with incomes below 250% of the federal poverty level. This initiative is reasonably expected to achieve outcomes under TANF Purpose #1: Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.

Father Engagement Programs

Father Engagement Programs provide assistance and support to fathers whose minor children are involved with the Department of Child Services (DCS). Providers work actively with DCS employees to engage fathers successfully in services that will improve safety, stability, well-being and permanency for their children. Providers will assist fathers in strengthening the relationship with their children and promoting positive relationships between the families and the local DCS family case managers and others involved in their children's case.

The Father Engagement Programs support the purposes of TANF because the services aim to strengthen the relationship between fathers and their children and promote positive relationships. Job Placement and training services for non-custodial parent(s) initiative is reasonably expected to achieve outcomes under TANF Purpose #2: To provide services that promote job preparation, work and marriage. The remainder of services provided under this initiative are reasonably expected to achieve outcomes under TANF Purpose #4: Encouraging the

formation and maintenance of two-parent families. Unless stated otherwise, Indiana defines for TANF that a 'qualified family' must have a gross family income below 400% FPL. Indiana Code (IC) 12-14-1(3)

Parent Education Program

Parent Education is the provision of structured, parenting skill development experiences. Education regarding parenting, discipline and child development is a means to provide parents whose children are "at risk" or have been abused or neglected with tools to assist them in the lifelong task of disciplining, understanding and loving their children. Family-centered parent training programs include family skills training and family activities to help children and parents take advantage of concrete social supports. A *combination* of individual and group parent training is the most effective approach when building skills that emphasize social connections and parents' ability to access social supports. However, the *individual* approach is most effective when serving families in need of specific or tailored services.

The following evidence-based programs are approved for use in these Parent Education efforts: Parent-Child Interaction Therapy (PCIT), STAR Parenting Program, Systematic Training for Effective Parenting (STEP), Strengthening Families Program (SFP), Incredible Years, Parent Management Training-Oregon Model (PMTO), Positive Parenting Practices (Triple P), Parents as Teachers-Born to Learn, Safe-Care, Nurturing Program, Active Parenting, Effective Black Parenting by the Center for the Improvement of Child Caring, 1-2-3 Magic and Parenting with Love and Limits.

This initiative is reasonably expected to achieve outcomes under TANF Purpose #4: Encouraging the formation and maintenance of two-parent families.

Parenting/Family Functioning Assessment

Parenting/Family Functioning Assessment consists of an in-home evaluation that includes standardized test instrument(s) to identify the strengths and needs of the family. The service is most appropriately used when the needs of the family are so complex that a traditional assessment completed by an IN DCS Family Case Manager is not able to determine the services necessary to improve the family's functioning. These families tend to have multiple caregiver ratings on the Child and Adolescent Needs and Strengths (CANS) of 2 or higher which indicates complex needs.

The interviews/assessments required include: Parenting/family functioning assessment to include an interview with the adults and children being assessed in their current home environment and completion by adults of standardized test(s) to include a parenting inventory (such as Parent-Child Relationship Inventory; Adult Adolescent Parenting Inventory-2; Family Assessment Device, Version 3; Family Assessment Measure Version III (FAM-III); and/or the Child Abuse Potential Inventory and /or another Standard Risk Assessment Instrument.

This initiative is reasonably expected to achieve outcomes under TANF Purpose #3: Prevent and reduce the incidence of out-of-wedlock pregnancies and TANF Purpose #4: Encouraging the formation and maintenance of two-parent families.

Visitation Facilitation

This service provides visitation between parents/children/siblings/and or others who have been separated. It allows the child to reconnect with their family in a safe environment. Supervised

visitation allows DCS Case Workers to assess the relationship with the parent in strengthening their parenting skills and developing new skills.

The youth must be available and participate in the visitation. The parent(s) as well as other family members in the home must participate in the visitation as scheduled session along with the youth. The full participation of the parent is very important to the success of the service. Provider will document and report to the DCS Case Worker the date, times of the visitation, who attended, positive interactions between parent and child, any interventions used and parent's response to that direction, any tasks given to the parent prior to next visit, any other pertinent information or concerns.

For two parent families, this initiative is reasonably expected to achieve outcomes under TANF Purpose #4: Encouraging the formation and maintenance of two-parent families. For single parent families, this initiative is reasonably expected to achieve outcomes under TANF Purpose #1: Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives. Unless stated otherwise, Indiana defines for TANF that a 'qualified family' must have a gross family income below 400% FPL. Indiana Code (IC) 12-14-1(3)

Tutoring / Literacy Classes

Tutoring/Literacy Classes are provided to children involved with the Department of Child Services (DCS) system, in order to raise the academic performance of these school aged youth to a level consistent with state education standards. This program is carried out using qualified vendors under carefully drafted agreements. Services are provided in a manner that is age and developmentally appropriate and consistent with the child's academic ability and learning style, interpersonal characteristics and special needs. Children are connected as appropriate with both formal and informal community supports, services and activities that promote their literacy skills. The child's characteristics such as race, culture, ethnicity, language and personal history including child abuse and neglect are considered when choosing or designing program interventions, materials and curriculum. The provider will develop an education plan to address the child's literacy and math needs.

This initiative is reasonably expected to achieve outcomes under TANF Purpose #3: Prevent and reduce the incidence of adolescent and out of wedlock pregnancies.

Community-Based Family Preservation Services

Family Preservation Services are services designed to work with families who have had a substantiated incident of abuse and/or neglect, but, where DCS believes the child(ren) can remain in the home with their caregiver(s) with the introduction of appropriate services to the family. "Caregiver" is broadly defined to include: Birth parent(s), Adoptive parent(s), Relative caregiver(s), Fictive kinship caregiver(s), Other caregiver(s) who has been providing care and housing to the child(ren) and who has been deemed to be appropriate by the Department of Child Services (DCS). These services are for the entire family.

Family Preservation Services include the assessment of child/parent/family resulting in an appropriate service/treatment plan that is based on the assessed need. Family Preservation Services are home-based and monitor and address any safety concerns for the child(ren). Any interventions are strength-based and family-driven with the family actively participating in identifying the focus of services.

This program is available for all children and their families in an Informal Adjustment (IA) or In-Home Child in Need of Services (CHINS) case with DCS, however, TANF state and federal funds will only be used for two-parent families or families below 250% of the federal poverty level. For two-parent families, this initiative is reasonably expected to achieve outcomes under TANF Purpose #4: Encouraging the formation and maintenance of two-parent families. For single-parent families with incomes below 250% of the federal poverty level, this initiative is reasonably expected to achieve outcomes under TANF Purpose #1: Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives. (June 2020 start)

Indiana Kids

TANF funds will be used to fund the Indiana Kids program. Indiana Kids provides education and youth development services to TANF eligible children ages five through thirteen through the Indiana Alliance of Boys and Girls Clubs. The program is designed to help children better their academic achievement and to provide an adult supervised structured environment thereby decreasing the opportunity for youth to engage in at-risk behavior, including pre-marital sex. This program also provides career guidance through field trips and/or career-related speakers or presentations. This initiative is reasonably expected to achieve outcomes under TANF Purpose #3: Prevent and reduce the incidence of adolescent and out of wedlock pregnancies.

Teen Pregnancy Prevention

FSSA has partnered with the Indiana State Department of Health in order to provide family planning services to those in need of services. This program is designed to reduce pregnancies among adolescent females through a comprehensive program which offers confidential birth control services, involves parents and equips young people to prevent sexual coercion. This program encourages participation of families, parents and/or legal guardians in decisions of minors to seek family planning services and pregnancy prevention through collaboration with multiple agencies including the Indiana Family Health Council, health care agencies and schools. This initiative is reasonably expected to achieve outcomes under TANF Purpose #3: Prevent and reduce the incidence of adolescent and out of wedlock pregnancies.

Pregnancy Support Program

FSSA has entered into an additional partnership with the State Department of Health and Real Alternatives, Inc. The comprehensive services offered include, but are not limited to, the following specific services: Information and counseling regarding pregnancy, fetal development, childbirth, child care, parenting, and adoption; Mentoring services related to parenting and life skills; Referral to other services available to support pregnant females and childbirth, including neonatal health care services; Promotion of public awareness of other resources that support childbirth; Programs to provide or assist expectant parents and their unborn children to obtain certain goods and services including, cribs and car seats, maternity and baby clothes, and temporary child care. Supports women in Indiana who thought they were experiencing an unplanned/crisis pregnancy, but who are found to be not pregnant by: Providing information on the risks of sexually transmitted diseases, relationship counseling, decision-making counseling, chastity information, teen pregnancy prevention programs, and other counseling to modify risk-taking behavior;

This program is intended to serve TANF purposes 3 and 4 through encouraging the formation and maintenance of two-parent families while providing pregnancy support services to expectant

parents as well as preventing and reducing the incidence of adolescent and out of wedlock pregnancies.

Workforce Development Program Partnerships

Jobs for America's Graduates (JAG)- Indiana is a multi-year program that targets high school juniors and seniors who are at risk of dropping out of high school due to significant barriers. JAG Indiana students have an average of 7.3 barriers that include single parent homes, unemployed parents, disabilities, homelessness and parenting teens. The program's overarching goals are as follows:

1. Provide a basic skills assessment and remediation to ensure program participants receive a high school diploma or its equivalent;
2. Assist in the attainment of employability skills needed to find a job and persist in the job and/or pursue postsecondary education. Students are taught 37 core competencies with the possibility of 85 total competencies to assure a strong attachment to the labor market; and
3. Help to ensure graduates remain employed full-time after graduation or transition to post-secondary education or training.

Indiana's JAG model provides tutoring assistance and adult mentoring. Participants receive individualized attention and identification of specific barriers to success, which may include low academic achievement, life skills, personal skills, and social or economic barriers. Students receive one full year of follow-up services after graduation as they transition into the workforce or post-secondary education. The follow-up services are designed to ensure success in their post-secondary endeavors. This initiative is reasonably expected to achieve outcomes under TANF Purposes #2 and #3: To provide services that promote job preparation, work and marriage and to prevent and reduce the incidence of adolescent and out of wedlock pregnancies. Unless stated otherwise, Indiana defines for TANF that a 'qualified family' must have a gross family income below 400% FPL. Indiana Code (IC) 12-14-1(3)

Family Housing Intervention

Crisis Assistance - Families facing a crisis situation may receive funding which prevents a disconnection or reactivates service. Crisis assistance may also be provided when a past energy debt prevents the family from receiving current utility service.

Deposit Assistance - Families needing assistance with a deposit payment to begin utility service.

Utility Bill Assistance - provide a maximum of two months of assistance with (estimated/budgeted) primary monthly heating or cooling utility bills. All payments are provided directly to the utility company. The family household must have a utility account and have the utilities listed in the name of a household resident /family listed on the application for program services. If, for some reason, the utilities are in a different name (such as a landlord), a detailed explanation and documentation will be required which shows that the family pays/is responsible for utility payments.

This initiative is reasonably expected to achieve outcomes under TANF Purpose #1: Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives. Unless stated otherwise, Indiana defines for TANF that a 'qualified family' must have a gross family income below 400% FPL. Indiana Code (IC) 12-14-1(3)

Indiana uses the Temporary Assistance to Needy Families (TANF) Block Grant to provide cash assistance and Indiana Manpower Placement and Comprehensive Training (IMPACT) Employment, Training, and Support Services to eligible TANF families. As a way for Indiana to maximize its resources in the talent development space and reduce duplicated efforts, IMPACT will coordinate more closely with WorkOnes regarding funding training and education. Since November 1, 2007, cash assistance applicants deemed mandatory for IMPACT have been referred to IMPACT for employment and training services. **Due to COVID-19 public health emergency declared by Indiana Governor Eric Holcomb (Executive Order 20-02) on March 6, 2020, Indiana has waived the mandatory work requirements for all TANF applicants/recipients from the date of this order through June 30, 2020. We will continue to offer employment and training services to those who wish to volunteer for services. The expectation is that all mandatory requirements for work will be back in place as of July 1, 2020. If this does not occur due to an extension of the public health emergency, another plan amendment will be submitted.**

TANF Cash Assistance: Financial eligibility for cash assistance includes both an income and resource test. The family must qualify using applicable income and resource standards. The income standard for initial eligibility is listed below:

Assistance Groups which Include Adults and Children

# of Members	Monthly Amount
1	\$139.50
2	229.50
3	288.00
4	346.00
5	405.50
6	463.00
7	522.50
8	580.00

Assistance Groups which Include only Children

# of Members	Monthly Amount
1	\$139.50
2	198.00
3	256.50
4	315.00
5	373.50

# of Members	Monthly Amount
6	432.00
7	490.50
8	549.00

The family remains eligible until its countable income exceeds 100% of the Federal Poverty Guidelines. This extension of income eligibility allows for continued access to employment services. In determining eligibility, the following disregards are applied to gross earned income:

- \$90 – Work Expense disregard
- \$30 and 1/3 Disregard – In addition to the work expense disregard, a work incentive disregard of \$30 and 1/3 is applied to the remaining earned income for four consecutive months.
- \$30 Disregard – Upon expiration of the \$30 and 1/3 disregard, an applicant/recipient is entitled to a deduction of \$30 from the earned income remaining after the standard work expense disregard is subtracted their eight (8) month period) and begins the month following the month the \$30 and 1/3 disregard expired.

In determining the benefit amount, 25% of gross earnings and 100% of non-exempt unearned income is used in the benefit calculation, thus 75% of earned income is disregarded in the benefit calculation.

Due to the COVID-19 public health emergency, the following policy changes have been made in order to ensure that TANF benefits can continue without interruption:

- **HHS/Administration for Children and Families issued a policy statement on April 11, 2020, concerning stimulus payments and pandemic unemployment payments. Stimulus payments are exempt as income for TANF. States have an option on how to consider the additional pandemic unemployment assistance. Federal Pandemic Emergency Unemployment Compensation, which provides an additional \$600 per week to individuals who are collecting regular state or Federal UC, through weeks of unemployment ending on or before July 31, 2020. Indiana will consider the emergency unemployment compensation noted above as exempt from consideration as income for TANF.**
- **Extending the certification periods and waiving the interview at recertification. This policy will remain in effect for recertifications being completed up through June 30, 2020.**

The resource standard for initial eligibility is \$1,000. Once determined eligible, the case is subject to a resource standard of \$1,500.

Indiana Manpower Placement and Comprehensive Training (IMPACT) Employment, Training and Support Services: IMPACT's combined approach of employment with education and training programs will best prepare an individual for career advancement and wage increases. Indiana will support and expand the development of training programs integrated into or delivered

in tandem with a Hoosier's employment experience. Individuals eligible for cash assistance will be given comprehensive personal and family strength and needs assessments, individualized service coordinated plans based upon the assessments, and referrals to appropriate service providers to overcome initial and on-going employment barriers. A key element of the education and training programs for low-income individuals will be work-based learning opportunities (e.g., on-the-job training, paid internships, pre-apprenticeships, and State Earn and Learns), allowing these individuals to both earn an income and advance their technical knowledge. Career pathways for low-income individuals must include short-term credentials of value that will stack towards postsecondary credentials and degrees along a career pathway, options for on-the-job training, and flexible participation options (part-time, extended hours, and online modules).

Due to the COVID-19 public health emergency, the following policy changes have been made and will be in effect through June 2020:

- **For applicants, removing the upfront applicant job search requirements**
- **For those receiving TANF, removing the work requirement and full family sanction. Please note that our employment and training staff with the IMPACT program will be reaching out to clients via phone in order to offer services. Participation in the call and offer of services is strictly voluntary with no risk to TANF benefits.**

For descriptions of the work activities that IMPACT will use, please refer to Indiana's Work Verification Plan. Under the Deficit Reduction Act of 2005, States are required to submit a Work Verification Plan explaining how it will verify the participation hours for the various work activities TANF recipients have been assigned to.

Case management and service coordination will focus on job placement, complemented by supplemental education, training, and skills development. Referrals to the Division of Disability and Rehabilitative Services and the Department of Workforce Development will be emphasized for those seeking talent development programming. Case management, education and training, and supportive services are provided to the client at no cost. The following is a list of the supportive services available to an IMPACT participant under the TANF Program:

Type of service	Payment Limits	Time limits
Clothing	\$300	Per 12 month period
Transportation Expense	\$200/month	TANF-Personal vehicle at \$.15 per mile, other at actual cost; FS- \$.10 per mile or \$2.00 per day whichever is higher.
Vehicle Repair and Maintenance	\$750	Per 12 month period.

Transportation expenses and vehicle maintenance may continue during IMPACT participant's employment for 90 days following the loss of TANF benefits. Through co-enrollment in WIOA Core Programs, however, an individual may continue to receive follow-up services for up to 12 months.

Domestic violence and substance abuse are factors that can impede any family's ability to become self-sufficient. The prevalence of these factors may be prevalent among low-income families. These

issues can be extremely difficult to identify and, although current policies permit exceptions and extensions to the state TANF time limit, when a domestic violence situation prevents an individual from participating in employment or training, very few individuals seek these opportunities. Due to the complexity of these issues, Indiana's Family and Social Services Agency has worked to raise both staffs' and individuals' awareness of the exemption and extension options.

B. REQUIRE A PARENT OR CARETAKER RECEIVING ASSISTANCE TO ENGAGE IN WORK (DEFINED BY THE STATE) ONCE THE STATE DETERMINES THE PARENT OR CARETAKER IS READY TO ENGAGE IN WORK, OR ONCE HE OR SHE HAS RECEIVED 24 MONTHS OF ASSISTANCE, WHICHEVER IS EARLIER, CONSISTENT WITH THE CHILD CARE EXCEPTION AT 407(E)(2) (SECTION 402(A)(1)(A)(II) OF THE SOCIAL SECURITY ACT)

A parent or caretaker receiving assistance under TANF will be required to engage in work once the state determines the parent or caretaker is ready to engage in work, or once the parent or caretaker has received assistance under the program for 24 months (whether or not consecutive). Whichever timeline an individual meets is the one that applies to his/her work requirements.

This first one is determined early during the thorough assessment process using the assessment, which asks, what family/parent/relative supports are in place to assist with childcare.

If child care assistance is needed, available and used, it is appropriate child care since it utilizes State approved/licensed child care providers based on State rates and based on proximity to a client's home since clients select their provider. This covers "appropriate child care", "affordable child care arrangements" and where informal care has proven to be unsuitable to client's needs. Since clients select where their children go, would be a reasonable distance in most all cases.

Policy:

2525.10.00 ASSESSING STRENGTHS AND BARRIERS TO SELF-SUFFICIENCY (S, C, I)

A comprehensive evaluation of an individual's needs and barriers is completed prior to beginning IMPACT activities. The participant must be actively involved in the completion of the assessment and in creating the self-sufficiency plan, including assisting in identifying strengths, interests and goals.

Details about IMPACT rights, responsibilities, activities and supportive services are also included as part of the assessment process.

The following areas should be addressed, as appropriate:

Transportation Resources: What type of transportation is accessible and used, and if transportation assistance is needed.

Child Care Needs: Determine the need for reliable child care and the presence of any special needs that must be addressed in the development of the child care plan.

Support Network: Identify those persons who provide emotional, social, or other support to the individual and family.

Work instructions Section 6.6.1 Supportive Services Determination

TANF and AJS clients:

When a participant has childcare in place, and a newborn needs to be added to the voucher, DO NOT have the participant give up the CCDF voucher that is currently in place, participant will not be eligible for child care for 90 days. The brand new baby will be placed on a waiting list and the participant will need to discuss their situation with the CCDF vendor to see if there is a scholarship program or sliding fee scale or any other arrangement that can be worked out.

Due to COVID-19 public health emergency declared by Indiana Governor Eric Holcomb (Executive Order 20-02) on March 6, 2020, Indiana has waived the mandatory work requirements for all TANF applicants/recipients from the date of this order through June 30, 2020. We will continue to offer employment and training services to those who wish to volunteer for services. The expectation is that all mandatory requirements for work will be back in place as of July 1, 2020. If this does not occur due to an extension of the public health emergency, another plan amendment will be submitted.

C. ENSURE THAT PARENTS AND CARETAKERS RECEIVING ASSISTANCE ENGAGE IN WORK IN ACCORDANCE WITH SECTION 407 (SECTION 402(A)(1)(A)(III) OF THE SOCIAL SECURITY ACT). CONSISTENT WITH THE REQUIRED STRATEGIC ELEMENTS DISCUSSED IN SECTION II (A)(2) HEREIN, PROVIDE A SPECIFIC ANALYSIS OF HOW THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES ARE ADDRESSING EMPLOYMENT AND TRAINING SERVICES FOR PARENTS OR CARETAKERS RECEIVING ASSISTANCE

Indiana will ensure that parents and caretakers receiving assistance under the program will engage in work activities in accordance with Section 407 of the Social Security Act, which establishes allowable work activities and participation rates. TANF staff will refer the individual to a local WorkOne for employment and career services. Please refer to Indiana's TANF Work Verification Plan for the details on how Indiana monitors work participation hours.

As noted in previous sections, due to COVID-19 public health emergency declared by Indiana Governor Eric Holcomb (Executive Order 20-02) on March 6, 2020, Indiana has waived the mandatory work requirements for all TANF applicants/recipients from the date of this order through June 30, 2020. We will continue to offer employment and training services to those who wish to volunteer for services. The expectation is that all mandatory requirements for work will be back in place as of July 1, 2020. If this does not occur due to an extension of the public health emergency, another plan amendment will be submitted.

D. TAKE SUCH REASONABLE STEPS AS THE STATE DEEMS NECESSARY TO RESTRICT THE USE AND DISCLOSURE OF INFORMATION ABOUT INDIVIDUALS AND FAMILIES RECEIVING ASSISTANCE UNDER THE PROGRAM ATTRIBUTABLE TO FUNDS PROVIDED BY THE FEDERAL GOVERNMENT (SECTION 402(A)(1)(A)(IV) OF THE SOCIAL SECURITY ACT)

The State will continue to restrict the use and disclosure of information about individuals and families receiving TANF assistance in accordance with state laws, I.C.5-14-3-4 and I.C. 12-14-1-7 and the Internal Revenue Code, Sections 7213 A and 7431. For TANF processing, FSSA DFR has a dedicated eligibility system solution that fully complies with IRS Publication 1075, which cites and supports compliance with all aspects of 7213A and 7431. Additionally, FSSA DFR has dedicated State employed staff for processing federal tax information (FTI) in support of TANF. This staff is fully made aware of the implications of the cited State laws and IRS code, along with all applicable

aspects of IRS Publication 1075. FSSA has dedicated security staff who work with the internal business, policy, operations, and system teams to realize security and policy requirements set forth in these laws and IRS code. This security team in turn works with the IRS for ongoing IRS Publication 1075 Safeguard Security Report (SSR) submissions and audits to demonstrate Sections 7213A and 7431 compliance, along with IRS Publication 1075 in general. This SSR process happens annually, and FSSA DFR continues to retain its compliance with IRS Publication 1075, as validated again in the the most recent SSR acceptance from the IRS on June 26, 2020, based on the State's submission on April 30, 2020. In terms of I.C. 5-14-3-4 and I.C. 12-14-1-7, all vendor contracts and MOUs associated with data sharing TANF data include this expectation in the boilerplate sections of their agreements with FSSA DFR. This compliance is subject to FSSA Audit as well as State Board of Accounts audits as applicable.

E. ESTABLISH GOALS AND TAKE ACTION TO PREVENT AND REDUCE OUT-OF-WEDLOCK PREGNANCIES, WITH SPECIAL EMPHASIS ON TEENAGE PREGNANCIES (SECTION 402(A)(1)(A)(V) OF THE SOCIAL SECURITY ACT)

Indiana continues to establish goals and take action to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on teenage pregnancies. The Indiana Department of Health is the lead agency in monitoring health outcomes and coordinating strategies to encourage abstinence and reduce teen pregnancy. The current rate for births to children age 15-19 is 28.0 births per 1,000 and can be found in the Indiana Maternal, Infant and Early Childhood Home Visiting Program Needs Assessment.

Indiana also includes pregnant youth as part of its 'At-Risk Youth' target population emphasized within WIOA Title I – In- and Out-of-School Youth programming.

F. CONDUCT A PROGRAM DESIGNED TO REACH STATE AND LOCAL LAW ENFORCEMENT OFFICIALS, THE EDUCATION SYSTEM, AND RELEVANT COUNSELING SERVICES, THAT PROVIDES EDUCATION AND TRAINING ON THE PROBLEM OF STATUTORY RAPE SO THAT TEENAGE PREGNANCY PREVENTION PROGRAMS MAY BE EXPANDED TO INCLUDE MEN (SECTION 402(A)(1)(A)(VI) OF THE SOCIAL SECURITY ACT)

Indiana currently conducts programs to provide education and training on teenage pregnancy prevention and statutory rape through prosecutor's offices, faith communities, schools, hospitals, and health departments to provide education and training regarding the problem of teenage pregnancy and statutory rape. Please refer to the Indiana Sexual Violence Primary Prevention Plan which includes services offered to men: http://www.state.in.us/isdh/files/Indiana_Sexual_Violence_Primary_Prevention_Plan_2016-2021.pdf. This plan was developed by the Indiana State Department of Health and its community partners programs. We hope to augment these efforts through increased co-location of our Division of Family Resources (DFR) offices, which administers TANF, and other community hubs of activity, such as schools, libraries, and community centers. Co-location to help provides these services to both staff and individuals may take varied forms depending on the local need:

- Formal co-location,
- Using itinerant staff,
- Mobile locations, and

- Referral relationships.

G. IMPLEMENT POLICIES AND PROCEDURES AS NECESSARY TO PREVENT ACCESS TO ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART THROUGH ANY ELECTRONIC FUND TRANSACTION IN AN AUTOMATED TELLER MACHINE OR POINT-OF-SALE DEVICE LOCATED IN A PLACE DESCRIBED IN SECTION 408(A)(12), INCLUDING A PLAN TO ENSURE THAT RECIPIENTS OF THE ASSISTANCE HAVE ADEQUATE ACCESS TO THEIR CASH ASSISTANCE (SECTION 402(A)(1)(A)(VII) OF THE SOCIAL SECURITY ACT)

Indiana Code Section 12-13-14-4.5 outlines the distribution of cash benefits through automated teller machines or point of sale terminals, as well as retailers eligible for participation in EBT, and the penalties for not following the prescribed requirements. In addition, Indiana Administrative Code 470 IAC 10.3-5-8 requires owners or operators of restricted establishments as being responsible for posting signs containing notice that ATM or POS terminals may not be used for distribution of TANF assistance or refugee assistance.

During the 2013 session, the Indiana State Legislature passed Senate Bill 559, now known as Public Law 197, which requires ATM and point of sale owners, vendors, or third party processors to disable access to TANF cash assistance at prohibited locations.

Federal Restrictions: On February 22, 2012, President Obama signed into law the Middle Class Tax Relief and Job Creation Act of 2012 (P.L. 112-96), which among its provisions, requires states receiving TANF grants to implement policies and procedures restricting access to TANF benefits via EBT at liquor stores, gaming establishments, and adult entertainment establishments. On September 10, 2012, DFR mailed a one-time notice to all current TANF payees and authorized representatives informing them of the access restrictions. Also in September 2012, DFR modified the TANF approval notices to include language about these restrictions. In October 2012, the mailer attached to all EBT cards included language regarding the restrictions.

In January 2013, Indiana implemented an EBT restricted site database matching system. This system contains information via a match with the State Alcohol/Tobacco Commission. This tool provides DFR with a list of possible violations. A DFR staff member reviews each reported match and determines whether the site is a restricted location. With the exception of packaged liquor, small brewers, and Type II gaming permits, this system requires the staff member to Google the address to become informed of the type of business at this location. If the business is not restricted (e.g., Applebee's or T.G.I. Friday's), the DFR staffer will mark the transaction as permissible in the reporting tool. If the business is in a restricted location (e.g., Vickie's Lounge or Old Point Tavern, etc.), DFR will send a letter to the TANF recipient informing him/her of the infraction with the date and location provided. In this letter, the TANF recipient is notified that any further infractions will be sent to the county prosecutor for enforcement. If the individual makes an inappropriate transaction in a subsequent month, a second letter will be sent to the individual informing him/her that DFR has referred the case to the prosecutor for appropriate action. Copies of the notices will be attached to the client's eligibility case.

- Initial Letter: A client will initially receive a letter informing him/her that it is a crime to access their TANF benefits at 'restricted' locations. The EBT Brochure and website will be referred to for reference and further information.

- Subsequent Letters: After the initial warning, if the individual continues to use his or her benefits in a 'restricted' location, s/he will receive a second letter informing him or her that the EBT card has been used again to access benefits in a restricted location and that DFR has notified local law enforcement of the crime. DFR will refer these cases to the FSSA Office of Investigations and Compliance. From the second letter forward, the FSSA Office of Investigations and Compliance will investigate clients who have made transactions in restricted areas and will send its findings to local law enforcement and/or Prosecutor.

H. ENSURE THAT RECIPIENTS OF ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART HAVE THE ABILITY TO USE OR WITHDRAW ASSISTANCE WITH MINIMAL FEES OR CHARGES, INCLUDING AN OPPORTUNITY TO ACCESS ASSISTANCE WITH NO FEE OR CHARGES, AND ARE PROVIDED INFORMATION ON APPLICABLE FEES AND SURCHARGES THAT APPLY TO ELECTRONIC FUND TRANSACTIONS INVOLVING THE ASSISTANCE, AND THAT SUCH INFORMATION IS MADE PUBLICLY AVAILABLE (SECTION 402(A)(1)(A)(VIII) OF THE SOCIAL SECURITY ACT)

Cash benefits may be redeemed at any commercial POS machine and financial institution's automated teller machine (ATM) that displays the QUEST logo. Merchants that accept the Hoosier Works EBT card display the QUEST logo in order to inform cardholders that their cards may be used at that location. Hoosier Works cardholders can use their EBT card in all fifty states plus Washington, D.C. as well as the U.S. territories of Guam and the Virgin Islands. Hoosier Work cardholders all have access to the Conduent EBT Website at www.connectebt.com, which provides information on where a cardholder can access their cash benefits. If a Hoosier Works EBT cardholder contacted the state with concerns of no ATM/POS available in their area to access cash benefits, the state would work with our EBT vendor, Conduent, in order to set up a POS device in the cardholder's area or work with local banks in the area to determine a solution for increased accessibility.

The first TANF cash withdrawal is free, after that the 2nd – 12th withdrawal is \$1.25 (this is charged by Indiana's EBT contractor, Conduent). After 12 withdrawals, all withdrawals are again free. Therefore, Conduent receives a maximum of \$13.75 per month in ATM fees per client.

There are about 1,600 POS participating merchants offering surcharge-free cash EBT only merchants. These are locations such as Kroger, Wal-Mart, etc. which offer cash back). Information about surcharges is current in our EBT brochure. TANF withdrawal and surcharge information is listed in the "Avoid Fees & Additional Charges" section of the brochure.

I. INDICATE WHETHER IT INTENDS TO TREAT FAMILIES MOVING FROM ANOTHER STATE DIFFERENTLY FROM OTHER FAMILIES UNDER THE PROGRAM, AND IF SO HOW (SECTION 402(A)(1)(B)(I) OF THE SOCIAL SECURITY ACT)

Indiana does not intend to treat families moving into Indiana from another state differently than other families under the program.

J. INDICATE WHETHER IT INTENDS TO PROVIDE ASSISTANCE TO NON-CITIZENS, AND IF SO INCLUDE AN OVERVIEW OF THE ASSISTANCE (SECTION 402(A)(1)(B)(II) OF THE SOCIAL SECURITY ACT)

Indiana intends to provide assistance under the program to the individuals who are not citizens of the United States to the degree permitted under federal law.

K. SET FORTH OBJECTIVE CRITERIA FOR THE DELIVERY OF BENEFITS AND THE DETERMINATION OF ELIGIBILITY AND FOR FAIR AND EQUITABLE TREATMENT, INCLUDING AN EXPLANATION OF HOW IT WILL PROVIDE OPPORTUNITIES FOR RECIPIENTS WHO HAVE BEEN ADVERSELY AFFECTED TO BE HEARD IN A STATE ADMINISTRATIVE OR APPEAL PROCESS (SECTION 402(A)(1)(B)(III) OF THE SOCIAL SECURITY ACT)

Indiana will continue to use objective criteria for the delivery of benefits and the determination of eligibility, as well as for fair and equitable treatment during an administrative appeal process. The Hearings and Appeals Section of Family and Social Services Administration will serve to address the unresolved issues between the applicants and recipients of TANF and the entities that administer the assistance programs. This appeals process continues to serve the fair hearing requirements of the SNAP and Medicaid Programs, as well. The appeals process is specifically defined in our Indiana on-line policy manual, Section 4200. A link to this section of the manual is included here for reference: <https://www.in.gov/fssa/files/4200.pdf>

L. INDICATE WHETHER THE STATE INTENDS TO ASSIST INDIVIDUALS TO TRAIN FOR, SEEK, AND MAINTAIN EMPLOYMENT (SECTION 402(A)(1)(B)(V) OF THE SOCIAL SECURITY ACT)—

1. PROVIDING DIRECT CARE IN A LONG-TERM CARE FACILITY (AS SUCH TERMS ARE DEFINED UNDER SECTION 1397J OF THIS TITLE); OR

2. IN OTHER OCCUPATIONS RELATED TO ELDER CARE, HIGH-DEMAND OCCUPATIONS, OR OCCUPATIONS EXPECTED TO EXPERIENCE LABOR SHORTAGES AS, DETERMINED APPROPRIATE BY THE STATE FOR WHICH THE STATE IDENTIFIES AN UNMET NEED FOR SERVICE PERSONNEL, AND, IF SO, SHALL INCLUDE AN OVERVIEW OF SUCH ASSISTANCE.

Indiana will develop career pathways under WIOA (programs of study under Perkins) that are built around careers and competencies in healthcare (which includes both child and elder care) and other high-wage, high-demand occupations. Our Workforce Ready Grants, a state program, will pay the tuition and mandatory fees for eligible high-value certificate programs at Ivy Tech Community College, Vincennes University, or other approved providers. The qualifying high-value certificate programs were selected based on employer demand, wages, job placements and program completion rate. These programs are aligned with Indiana's highest demand sectors:

- Advanced Manufacturing
- Building & Construction
- Health Sciences
- IT & Business Services
- Transportation & Logistics

Depending on an individual's career aspirations, this is a state-funded resource WorkOnes can direct low-income individuals towards to help mitigate the costs of training. This state program will cover the costs of training and education, while the WorkOne can provide ongoing counseling, coaching, and other career services and job training for someone receiving TANF through WIOA

Titles I, II, or III (as applicable). TANF E&T could assist with wraparound services, such as transportation, childcare, equipment and supplies, and other supports an individual needs in order to access the labor market. This may not be the best fit for every individual, since it is restricted to certain sectors and may not provide immediate income relief, but it could be a future opportunity within an individual's career pathway. TANF E&T programs will coordinate with other Core and Partner Programs. The TANF block grant will be used to help cover costs of any certification, credentialing, or examination costs, easing one barrier to Hoosiers earning postsecondary credentials.

M. PROVIDE FOR ALL MOE-FUNDED SERVICES THE FOLLOWING INFORMATION: THE NAME OF THE PROGRAM BENEFIT OR SERVICE, AND THE FINANCIAL ELIGIBILITY CRITERIA THAT FAMILIES MUST MEET IN ORDER TO RECEIVE THAT BENEFIT OR SERVICE. IN ADDITION, FOR TANF MOE-FUNDED SERVICES (CO-MINGLED OR SEGREGATED MOE) DESCRIBE THE PROGRAM BENEFIT PROVIDED TO ELIGIBLE FAMILIES (SSP SERVICES DO NOT HAVE TO INCLUDE A DESCRIPTION BUT THE DEPARTMENT OF HEALTH AND HUMAN SERVICES ENCOURAGES IT) (§263.2(B)(3) & §263.2(C) PREAMBLE PAGES 17826-7)

In addition to the federal funded TANF programs, Indiana will utilize TANF Maintenance of Effort (MOE) funds to support the following separate state programs for families who meet the definition of TANF eligible detailed below:

- Textbook Reimbursement Program
- Earned Income Tax Credit (EITC)
- Individual Development Accounts (IDA)
- Early Intervention/First Steps Medical Services
- Community Health Centers
- Community Based Services
- Solely-State Funded Cash Assistance Minimum Grants

Textbook Reimbursement Program: Indiana provides payment for the elementary and secondary school textbook rental fee of families whose income is less than 185% of the federal poverty level. Benefits for this program are accessed through an application form processed by the school system. The application is a form, which facilitates access to the free or reduced price school meals programs administered through the United States Department of Agriculture.

Earned Income Tax Credit (EITC): This tax credit is available to an individual who, in a year, has at least one qualified child. As of the 2018 tax year, the following thresholds apply.

- \$49,194 if you have three or more qualifying children, increasing to \$54,884 if you're married and file a joint return.
- \$45,802 if you have two qualifying children, increasing to \$51,492 if you're married and file a joint return.
- \$40,320 if you have one qualifying child, increasing to \$46,010 if you're married and file a joint return.

- \$15,270 if you have no qualifying children, or \$20,950 if you're married and file a joint return.

The EITC cannot exceed 9% of the federal credit. It is only the refundable portion of the tax credit is reported as MOE.

Individual Development Accounts (IDA): The IDA Program is designed to offer Hoosier households the opportunity to build assets, accumulate savings, and learn personal finance skills so that they may pay for education, start or buy a business, or buy a home. The funds are administered by a Community Development Corporation (CDC). Qualified individuals receive state funds to match their contributions to the IDA. The state match is three times the amount deposited by the individual up to \$800 per year. The state contribution for families with dependent children who receive public assistance or have incomes less than 200% of the federal poverty level will be counted towards MOE.

Early Intervention/First Steps Medical Services: First Steps provides medical services to all Hoosiers regardless of eligibility. First Steps does not provide comprehensive medical care, but provides services determined necessary by the child's early intervention team to meet the his or her developmental needs. Services are authorized through the development of an Individualized Family Service Plan (IFSP) with the support of the child's primary care physician. Funding will be used to pay for the costs of services that are not otherwise paid by Medicaid. Funding is blended with existing sources and will be transparent to the family, although the funding will be separately identifiable for the purposes of accountability. Unless stated otherwise, Indiana defines for TANF that a 'qualified family' must have a gross family income below 400% FPL. Indiana Code (IC) 12-14-1(3)

Community Health Centers: The Indiana State Department of Health (ISDH) and Office of Primary Care (OPC) administers the Community Health Center (CHC) Operating Grant. Funds are received from part of the Master Tobacco Settlement as authorized by the Indiana Senate Enrolled Act 108 – 111th General Assembly, March 2000. The ISDH-OPC promotes the development and operation of community-based primary healthcare services, including family planning, in areas of need that improve the health status of medically underserved populations of Indiana.

A community health center provides primary health care services by state licensed professionals, which are also comprehensive in scope, coordinated within the community, acceptable, accessible, affordable, appropriate, and available. Payment for services is based upon a sliding fee scale. Unless stated otherwise, Indiana defines for TANF that a 'qualified family' must have a gross family income below 400% FPL. Indiana Code (IC) 12-14-1(3)

Community Based Services: Through a variety of local agencies, townships, and third-party foundations, and community-based organizations and service providers, Indiana offers an extensive array of MOE help and services to children and families whose income is less than 250% of the federal poverty level. These include, but are not limited to, the following examples:

- Township emergency financial and material assistance and services programs;
- Food assistance programs, including pantries, soup kitchens, and summer feeding programs;
- Youth development and mentoring programs;
- Pre-school and child development programs;
- After-school programs of education, homework guidance, recreation, and enrichment;
- Programs of United Way agencies that meet a TANF purpose;
- Individual, marital, and family counseling services;
- Community centers that provide a variety of family supports and services;
- Comprehensive domestic violence services and shelters that provide families counseling, a safe haven, and the provision of basic needs;
- Homelessness shelters, housing, employment, and stabilization services;
- Income tax clinics;
- Employment, housing and community re-engagement for ex-offenders;
- Residential shelter and outreach to independent teens;
- Classes in parenting, child development, and financial management;
- Programs that provide public awareness, education, and advocacy to prevent child abuse and neglect in families, to prevent out-of-wedlock pregnancies, and to promote marriage and fatherhood; and
- Postsecondary career, vocational, and technical education programs for youth or parents.

Solely-State Funded Cash Assistance Minimum Grants: Since October 1, 2011, TANF Cash Assistance recipient families determined eligible for a \$0 TANF grant due to employment income are eligible for a minimum. The minimum grant paid will be solely state funded. To qualify for a minimum grant, the family must meet the following criteria:

- The household's income is below the TANF cash assistance income eligibility limit (100% FPL).
- The household's countable income is above the maximum benefit amount.
- A parent or caretaker has income from employment.
- Parent or caretaker is not serving a sanction or voluntary quit penalty.
- The family must be receiving TANF cash assistance in the month prior to becoming a \$0 grant case.

The family must continue to meet all financial and non-financial requirements of the TANF Cash Assistance program to receive the minimum payment. If the family meets all other eligibility requirements, the minimum grant remains in place until:

- The household's circumstances change (income decreases, change in household composition, etc.) and it is once again eligible for a TANF grant;
- The employed parent/caretaker loses employment; or

The household's countable income exceeds 100% FPL.

TANF CERTIFICATIONS

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

The State Plan must include	Include
1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);	Yes
2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);	Yes
3. Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—	
3. (A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and	Yes
3. (B) have had at least 45 days to submit comments on the plan and the design of such services;	Yes
4. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);	Yes
5. Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);	Yes
6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—	

The State Plan must include	Include
6.i. screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;	Yes
6.ii. refer such individuals to counseling and supportive services; and	Yes
6.iii. waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.	Yes