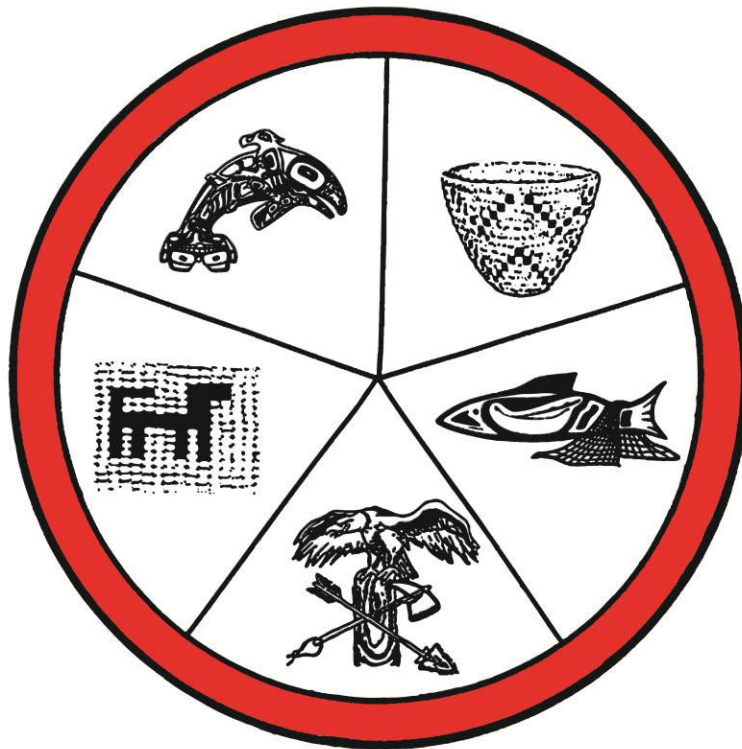


South Puget Intertribal Planning Agency



Workforce Development Program Policy & Procedures Manual

Approved by the SPIPA Board of Directors
Date: October 10, 2025

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WORKFORCE DEVELOPMENT

Section 1 - General Factors of SPIPA Intertribal Workforce Development Program

A. Introduction

The SPIPA Workforce Develop Program (WFD Program) was established in 2016 as a directive of the SPIPA Board and Strategic Plan to explore the creation and expansion of a comprehensive workforce development program. The WFD Program works with Consortium Tribes to identify training needs and gaps in qualifications and supports Tribes in addressing identified gaps. The Program explores workforce development and training opportunities to share with Tribes and supports Consortium Tribes by increasing Tribal Member employability through workforce development and training programs.

The SPIPA Workforce Development Program is authorized by Board Resolution to implement an integrated program using a single plan, single budget and single report for three (3) Federal Programs with one (1) Federal Agency. The Board and Tribal Councils of all five Consortium Tribes support and have approved the submission and operation of the Workforce Development PL 102-477 Plan (WFD Plan). **See attached WFD Plan**

As authorized by the Indian Employment, Training, and Related Services Demonstration Act of 1992, Public Law 102-477, effective October 1996, as amended, SPIPA identified and received federal approval for the following Federal Programs to be integrated:

U.S. Department of Health and Human Services (HHS) - Administration of Children and Families (ACF)

Child Care and Development Fund (CCDF)
Temporary Assistance to Needy Families (TANF)
Native Employment Works (NEW)

U.S. Department of Labor (DOL) – Employment and Training Administration

Workforce Innovation Opportunity Act (WIOA)
Adult Comprehensive and Supplemental Youth

B. Authority

Public Law 102-477 is the Indian Employment, Training, and Related Services Demonstration Act of 1992, as amended by Public Law 106-568, the Omnibus Indian Advancement Act of 2000. Public Law 102-477 is unique among Federal legislation, in that it allows Federally-recognized Tribes and Alaska Native entities to combine formula-funded Federal grants funds, which are employment and training-related into a single plan with a single budget and a single reporting system.

The Bureau of Indian Affairs is the lead federal agency for implementing the Demonstration Project created by Public Law 102-477, the Indian Employment, Training and Related Services Act, 25 U.S.C. section 3401 et seq.

The SPIPA Board of Directors, and participating councils, adopted the current Program Plan October 1, 2020.

C. Goal of the WFD Program

The South Puget Intertribal Planning Agency adopted the following goals for the Workforce Development Program.

- To integrate employment, training, cash assistance, childcare and related services in order to improve the effectiveness of those services.
- To provide education, employment, training, and related services to eligible community members that will lead to self-sufficiency.
- To reduce current unemployment rates among Consortium Tribal members and other federally recognized Tribal members residing in the service area.

- To provide and expand services that will allow for safe and healthy environments for children.
- To provide continuous services to children while enabling parents and guardians to seek gainful employment, obtain educational goals, as well as providing them with a comprehensive family support system.
- To provide assistance to needy families so that children can be cared for in their own homes.
- To end dependency of needy parents on public assistance programs.
- To prevent and reduce out-of-wedlock pregnancies and to encourage the formation and maintenance of two-parent families.
- To serve tribally determined goals consistent with the policy of self-determination and self-governance.

D. Purpose of the Workforce Development Program

The WFD Program assists individuals at the Consortium Tribes and communities by integrating cash assistance, childcare and employment and training services with a single point of entry to improve the effectiveness of such services and increase or improve employment.

The SPIPA WFD Policy and Procedural manual provides program staff with policies used to determine WFD/477 Program and Service eligibility and program procedures. This manual will assist WFD and Federal Agency staff with guidance needed to determine eligibility, assess employability, evaluate support services, and appropriately assigned or approved work activities intended to lead clients toward economically self-sufficient.

E. Restriction of Uses of Federal Funds

Cash Assistance Services (TANF)

Only needy families, as defined in the TANF plan, may receive: (a) any form of Federally-funded "assistance" (as defined in the Federal Register [CFR] 286.10); (b) any benefits or services pursuant to TANF purposes 1 or 2, regardless of the purpose served; and (c) any benefits or services funded with State-provided matching funds (MOE). "Needy" means financially deprived, according to income and resource (if applicable) criteria established in the TANF plan by the Tribe to receive the particular "assistance," benefit or service.

The Tribe may use segregated Federal Tribal funds (not State MOE funds) to provide services (and related activities) that do not constitute "assistance" (as defined in 45 CFR 286.10) to individuals and family members who are not financially deprived but who need the kind of services that meet TANF purposes 3 or 4. Objective criteria will be established for participation in these programs.

Childcare Services (CCDF)

The CCDF shall be expended in accordance with federal requirements and applicable state and local laws, except as superseded by 45 C.F.R. 98.3. CCDF funds may not be used as the nonfederal share for other federal grant programs.

For students enrolled in grades 1–12, CCDF funds may not be used for school tuition or for any service provided during the regular school day or that supplants or duplicates the academic program of any public or private school.

Funds provided under grants or contracts to providers may not be used for any sectarian purposes. However, childcare certificates may be used for sectarian purposes when provided as part of childcare services. For example, a parent can use a CCDF certificate or voucher to pay for childcare services provided in a church facility, even when part of the childcare program includes worship or religious instruction.

Employment and Training (N.E.W. and W.I.O.A.)

No Restriction of Uses of Federal Funds at this time.

F. Program Eligibility

Basic WFD eligibility is for Employment and Training Services only, financial, and non-financial.

The basic requirements for someone to be eligible to become a client of the Workforce Development/477 Program include, but are not limited to, the following:

1. Application (signed and dated by applicant and WFD Program staff)
2. Residency within service area

3. Tribal enrollment, or affiliation, or a descendant of a Tribe, or BIA Certificate of Degree of Indian or Alaska Native Blood (CDIB)
4. Selected Services registration, if applicable. A waiver may be requested.
5. Signed and dated Individual Service Plan (ISP)

And meet at least one at-risk criteria, such as, but not limited to, the following, if otherwise unserved:

- **Low Income**
- **Under Employed**
- **Unemployed**
- **Youth**
- **At Risk Youth**
- **Elder**
- **In need of a skill enhancement**
- **Transition**
- **Homelessness**
- **At Risk of Homelessness**
- **Crisis Prevention**
- **Veteran**
- **Disability**
- **Re-entry**
- **In need of childcare**
- **Other At Risk Criteria**

Additional eligibility requirement for **Cash Assistance and Childcare Assistance Services** are in Section 10 and Section 11. In order for a client to receive Cash Assistance and Childcare Assistance Services, the application must meet and comply with all applicable policies outlined in their respective sections. If a minor member of the household is determined eligible, all members of the household can be served.

For Cash Assistance Services:

If minor child is eligible, the child will be the applicant for services and the adult (parent, caretakers, guardian, etc.) will need to sign all paperwork on the child’s behalf.

Eligible minor child may qualify the household for cash assistance services through affiliation.

Standards of confidentiality of client information, client requirements/responsibilities, and the appeal process are defined in our policy and procedure manual.

G. Youth Eligibility

Youth must meet basic requirements to be eligible to become a client of the Workforce Development/477 Program. These include, but are not limited to, the following:

1. Application (signed and dated by the youth, parent/guardian and WFD Program staff)
2. Residency within service area
3. Tribal enrollment, or affiliation, or a descendant of a Tribe, or BIA Certificate of Degree of Indian or Alaska Native Blood (CDIB) or a sibling, youth relative, or foster child living in the same household
4. Selected Services registration, if applicable. A waiver may be requested.

5. Signed and dated Individual Service Plan (ISP) and
6. Enrolled and attending school (unless pre-K) or working on their GED/HS21 Completion

And have an identifiable risk factor to include, but not be limited to, the following:

- Low Income as defined by the annual HHS poverty guidelines
- High School Dropout
- Basic Skills Deficient
- Homeless, Runaway or Foster Child
- Communication, Leadership, Life skill enhancement needed
- Pregnant or Parenting Teen
- Youth Offender
- Other Risk Factors identified

As part of the intake process, the WFD Program may conduct a Youth Assessment to identify current and potential challenges and/or needs. An ISP will be developed to provide services that will help ensure their success. The assessment will include, but not be limited to, the following:

- Attendance and Grades
- Career Development
- Employment
- Financial Literacy
- Mental Health
- Treatment

Section 2 - Intake Standards

A. Application Process

1. Right to Apply

Any person has the right to apply for SPIPA Workforce Development Services. The intake application and process will address specific barriers to employment, education and other goals. In the event the applicant appears to require intensive case management to include financial assistance they will be screened for such eligibility which may require additional documentation. The application must be signed and dated which attests the information on the application is true to the best of the applicant's knowledge. The application will be entered into the database when it is completed, and all eligibility documentation has been received.

Additional application and eligibility documentation will be required for Cash Assistance and Childcare Assistance Services.

2. Initial Interview Requirement

- a. The application process will include a personal interview between a Program staff member and applicant. The interview process may be done via in-person, over the phone or video conference.
- b. The interview will include, but not be limited to:
 - i. Program Overview
 - ii. Program and Service Eligibility requirements,
 - iii. Creating basic Individual Service Plan (ISP) and
 - iv. Assessments.
- c. The interview must occur within five (5) business days of a completed application. An application is considered complete when filled out, signed and dated by applicant and WFD Staff, and all eligibility documentation is received.

3. Disposition of Application

a. Application Valid 30 Days

An application shall be considered current for 30 days from the date the application is signed and waiting for supporting eligibility documents; otherwise, a new application will be required in which service eligibility is based on the most recent application. The effective date of eligibility will be the date the application is considered complete with all required documentation to complete intake.

- b. A new application will be required if applying for Cash Assistance and or Childcare Assistance and any eligibility requirements have changed (e.g. residency or youth who have reached their 18th birthday and need to register for the Selective Service).

c. Eligibility Decision

Once the application has been received, and the intake staff has determined it to be complete, the Site Manager or designee shall make an eligibility decision.

d. Notice of Eligibility

Notices of Eligibility shall be mailed to the applicant no later than 10 business days after the completed application is received with all required documentation. The notice will state the type of service(s) the client is eligible for and when it begins.

e. Notice of Denial

Notices of Denial shall be mailed to the applicant no later than 10 business days after the completed application is received with all required documentation. The Notice of Denial will give the specific reason(s) for the denial and include information about the appeal process.

f. All notices must be generated out of TAS and Case Noted.

4. Documentation

- a. The applicant has the primary responsibility for providing all documentation. Program staff may assist an applicant with gathering eligibility documentation when necessary.
- b. If a physical copy of the required documentation is not available, proof that it was ordered will meet the documentation requirement.
- c. If physical copy cannot be obtained, then other forms of verification may be approved by the Program Manager.
- d. Copies of all documents shall be maintained in the case file.
- e. A client cannot be found eligible for SPIPA Workforce Development if the applicant refuses to allow the program staff to verify or document information relevant to the eligibility determination.

5. Non-duplication of Services

- a. Applicants (including children) who indicate they have received assistance from another program shall not be eligible for the same SPIPA Workforce Development Service unless they are no longer receiving said services/benefits from the other Workforce Development Programs.
- b. Verification shall be obtained from the appropriate community, state or tribal systems, maintained in the hard file, and documented in TAS. As an internal auditing precaution all cases shall have a member of the SPIPA Workforce Development staff crosscheck the applicant's information prior to providing services. There are no exceptions to crosschecks, they are necessary for auditing purposes.
- c. If a duplication of services/benefits occurs, the second program to serve the family shall recoup the duplicate funds expended.

If the WFD Program is determined to be the second program accessed for the service, staff will case note the duplication of services/benefits received by the client and set up a repayment plan.

- i. No services can be requested until repayment plan is established or
- ii. If the client does not agree with the repayment plan, then no services can be accessed for at least 6 months. The Program is a last dollar resource, and no duplication of services is allowed.

6. Eligibility Statement

- a. An Eligibility Statement shall attest to the "General Factors of Eligibility" that have been established.
- b. Signatures of both the staff member who conducted the intake, and the Site Manager is required on the Eligibility Statement.
- c. The original Eligibility Statement shall be maintained in the client file.

7. Client Documentation

Intake staff may give copies of all intake documents to the client.

B. Application

1. Filling out the Application

- a. An applicant may obtain an application at any SPIPA Workforce Development office, call an office to request an emailed or mailed application or may fill out an application over the phone during normal business hours. Client may sign application upon first office visit.
- b. Staff shall ensure that all fields on the application are completed correctly. Any corrections made to the application shall be initialed by the SPIPA WFD staff or client.
- c. Any question that does not apply to the applicant's situation or that has "none" as the answer may be answered by entering any word or mark that indicates the question has been responded to: "N/A", "0", "None", "X", "—", etc.
- d. The applicant shall attest to whether they have previously received services/benefits from another community, state or tribe. The applicant is required to attest to whether the family is currently disqualified from participating in any other tribal/state or Federal program.
- e. No services shall be given until all eligibility criteria have been established and an on-site interview has been conducted.

2. Required Signatures on the Application are:

- a. Adult and/or Youth Applicant.

- b. The staff member(s) who conducted the interview.
- c. Signatures from applicants may be obtained electronically or over the phone with staff Verification which includes adding a date and time stamp to the application.

3. When is an Application and Eligibility Documentation Required to Be Completed?

- a. Any time a client applies to the Program, including when transferring between sites;
- b. When a client reapplies from a closed, denied, withdrawn, or terminated status, unless the case closure was caused by administrative error;

4. When is a New Application NOT Required?

- a. To reinstate a closure attributed solely to an administrative error;
- b. When there is an address change but no change in site, (eligibility documentation is still required); and
- c. When there is a client name change but no change in household members. Legal name change documentation is required.

5. Withdrawal of Application

Voluntary withdrawal: The applicant may withdraw their application either verbally or in writing at any point in the eligibility process.

- a. If the case was input into TAS, the appropriate staff will Case Note and close in TAS, and mail a closure notice to the client.
- b. If the case was not input into TAS, the application may be shredded or filed with the Closed Cases.

6. Approved Applications

- a. Approved applications are valid for one year or until the client no longer meets eligibility requirements. Applications will remain valid for an additional year with an annual recertification.
- b. If a client does not complete annual recertification, then the application and case are no longer valid.

Additional documentation and income guidelines are required to receive Cash Assistance and Childcare Assistance Services as defined in policy and procedures.

C. General Eligibility as Defined in the Federally Approved SPIPA 477 Workforce Development Plan

To be eligible to receive services under the Program:

1. A client **must** include:
 - a. An adult over the age of 18; or

- b. A youth who is school aged and enrolled in school and actively participating in their education. This may include youth who are working on their GED or HS21Completion; and
- 2. The client **must** reside in the SPIPA Workforce Development service area; and
- 3. The client **must** be a member of an Indian Tribe, or affiliated, or a descendant of a Tribe, or BIA Certificate of Degree of Indian or Alaska Native Blood (CDIB). **See Cash Assistance and Childcare Sections for criteria and documentation needed per Tribe, per Service, per Service Area.**
- 4. Selective Service registration, if applicable. A waiver may be requested.
- 5. Signed and dated Individual Service Plan (ISP)

D. **General Eligibility Factors**

All factors of eligibility shall be met and documented.

- 1. Completed and Signed Application** - must be verified, signed and dated by applicant and WFD Program Staff.
- 2. Client** – must be a member of a federally recognized tribe, or affiliated, or a descendant of a Tribe, or BIA Certification of Degree of Indian or Alaska Native Blood (CDIB)
- 3. Residency** – Proof of residency in the Program’s service area includes a reasonably current (**see Section E: Workforce Development Service Area**):
 - a. Rent or lease agreement;
 - b. Statement from landlord;
 - c. ACES verification from state;
 - d. Mortgage papers;
 - e. Utility company record or bill addressed to the primary applicant at current address;
 - f. Letter from education or local, state, tribal, or governmental agency addressed to the primary applicant at current address; or
 - g. A signed residency statement may be accepted when homeless, with verification from an adult with whom client is residing, or when any of the other items cannot be obtained.
 - h. A PO Box is not acceptable in any circumstance.
- 4. Tribal Affiliation**
 - a. Verification of enrollment in a federally recognized tribe.
 - b. **Per Tribal definition:** Tribal affiliation, or a descendant of a Tribe, or BIA Certification of Degree of Indian or Alaska Native Blood (CDIB)

5. Selective Service, if applicable or a waiver is approved by the Site Manager. See Section F: Selective Service.

One of the following documents required:

- a. Copy of Selective Service Registration, <https://www.sss.gov/verify/>;
- b. SPIPA WFD Selective Service Waiver Form or
- c. Not Applicable, male client is under 18 years of age or a female (must be marked on application and case noted)

6. Signed and dated ISP

The intake ISP will address specific barriers to employment, education and other goals and will need to be signed and dated by the applicant. The ISP will include, but not be limited to, the following:

- a. Employment Goal
- b. Education/Training Goal

A more comprehensive ISP may be established if the applicant is applying for additional services and/or needs intensive case management services.

Assessments

Clients may be assessed to accurately determine their employment/training/education needs or their challenges to achieving self-sufficiency. Assessment tools, if needed, to determine aptitude and interest may be used prior to referring participants to occupational placement or training.

At the WFD Staff's discretion, type and use of assessment tools may vary and/or be waived if warranted.

Assessments concerning trauma, substance abuse, or mental health may also be utilized. When a Case Manager makes a recommendation for such assessments and the client agrees, the Case Manager will make a referral to a provider that serves as a partner to the WFD Program. The Case Manager will work with the Counselor/Therapist to share information that would be conducive to developing an appropriate ISP.

Based on the information gathered at intake and assessment, the case manager will assist in identifying challenges that might prevent a client from achieving their goal of self-sufficiency. Any challenges that might be identified will be a basis for the development of an individual plan.

WFD Program may conduct a Youth Assessment to identify current and potential challenges and/or needs. An ISP will be developed to provide services that will help ensure their success. The assessment will include, but not be limited to, the following:

- Attendance and Grades
- Career Development
- Employment
- Financial Literacy

- Mental Health
- Treatment

7. School Enrollment - Youth applicant only

- a. School aged youth, child age 6 or older, must be enrolled in primary, secondary school, working on their GED or HS21 completion or in the equivalent level of vocational or technical training, and
- b. School Enrollment and Attendance Form completed.
- c. Client file must include current school year documentation.
- d. When school is not in session, eligibility will be granted until school resumes and enrollment can be provided.

E. Workforce Development Service Area

The WFD Program service area will include, but is not limited to, the following areas – unless the client is otherwise unserved – and as long as the client does not receive the same services from another tribe/program:

- Grays Harbor
- Kitsap
- Lewis
- Thurston
- Mason
- Pacific
- Pierce
- Thurston
- Wahkiakum

Additional Service Area guidelines are required to receive Cash Assistance and Childcare Assistance Services as defined in Cash Assistance: Section 9 and Childcare Assistance: Section 10

F. Selective Service

To be eligible for services in the Workforce Development Program, all male US citizens and male immigrants, who are 18 – 25, are required to register with Selective Service. If the male applicant did not register for the Selective Service when they were 18-25, a program waiver may be granted with Site Manager approval. The waiver request and Site Manager’s approval must be thoroughly documented in the file and case noted in TAS.

Staff will verify Selective Service Registration, <https://www.sss.gov/verify/>, at intake and place results in eligibility file.

If the male applicant did not register with the Selective Service and does not qualify for the WFD Program Selective Service Waiver, they will not be eligible for cash assistance, employment and training or childcare services within the Workforce Development Program.

Selective Service Waiver

To be eligible for a waiver, the male applicant must prove that he was unable to register for the Selective Services from 30 days before he turned 18 through age 25. A male applicant must meet and prove the following criteria to be considered for the program waiver:

- 1. Hospitalization:** placed in a hospital, nursing home, long-term care facility, or mental institution on or before his 18th birthday, had no breaks of institutionalization of 30 days or longer, and remained institutionalized until his 26th birthday
- 2. Confined to home:** whether his own or someone else's (including group homes), on or before his 18th birthday and cannot leave the home without medical assistance (for example, by ambulance, or with the help of a nurse or EMT) and remained homebound until his 26th birthday.
- 3. Incarceration:** was continuously incarcerated or confined from 30 days before he turned 18 through age 25. If he were released for any period longer than 30 days during this window, he is still required to register and would not be eligible for the Program Waiver.
- 4. Resided in Rural Community:** was unaware of Selective Service Requirement 30 days before he turned 18 through age 25 while residing in rural community where selective service outreach did not occur.

The following supporting documentation, as applicable, must be attached to the Select Service Waiver Form and forwarded to the site manager for approval at intake. If the waiver is denied, the Workforce Development case will not be opened, and the applicant is not eligible for cash assistance, employment and training or childcare services.

- Proof that the applicants date(s) of confinement or institutionalization are accurate;
- Proof that the applicant was continuously incarcerated, or never released for any period of 30 days or longer; or
- Personal statement that must include why the application was not aware of the requirement to register.

Approval or denial of the WFD Program Selective Service Waiver only applies to cash assistance, employment and training and childcare services within the Workforce Development Program.

G. Acceptable Documentation for Eligibility

Items to Verify:	Minimal Acceptable Verification:
Application Completed, Signed and Dated	Verify application signatures & initials: <ul style="list-style-type: none"> • Client • May be signed in person, verified by email or by Workforce Development staff over the phone. • Workforce Development staff
Residency One from the list for the following counties: <ul style="list-style-type: none"> • Grays Harbor • Kitsap • Lewis • Thurston • Mason • Pacific • Pierce • Thurston • Wahkiakum 	<ul style="list-style-type: none"> • Rent or lease agreement; • Statement from landlord; • Mortgage papers; • Utility company record or bill addressed to the primary applicant at current address; • Letter from education or local, state, tribal, or governmental agency addressed to the primary applicant at current address; or • A signed residency statement may be accepted when homeless, with verification from an adult with whom client is residing, or when any of the other items cannot be obtained. • A PO Box is not acceptable in any circumstance.
Tribal enrollment, or affiliation, or a descendant of a Tribe, or BIA Certificate of Degree of Indian or Alaska Native Blood (CDIB)	<ul style="list-style-type: none"> • Tribal Enrollment card • Written verification from Federally Recognized Tribe that includes tribal enrollment, affiliation, or descendant (see ____ Section for approved process from each Tribe) • CDIBs that include enrollment in tribe (enrollment in a corporation is not considered enrollment in a tribe)
Selected Services registration, if applicable. A waiver may be requested	One of the following documents required: <ul style="list-style-type: none"> • Copy of Selective Service Registration, https://www.sss.gov/verify/; • SPIPA WFD Selective Service Waiver Form or

	<ul style="list-style-type: none"> • Not Applicable, male client is under 18 years of age or a female (must be marked on application and case noted)
Signed and dated Individual Service Plan (ISP)	Basic ISP must be done at intake to develop Workforce Development goals tied to employment and education.

H. Assignment of the Case

1. Once eligibility has been determined, the Site Manager will assign the case to a Case Manager.
2. The staff who conducted the interview should make a thorough Case Note indicating at minimum the following:
 - a. Case type
 - b. Does Client have medical and food assistance
 - c. Employment
 - d. Barriers to Self Sufficiency
 - e. Any information the intake staff feels important to case manager that was disclosed at intake.
3. The staff who conducted the interview may meet with the assigned case manager to staff the client.

I. Employment and Training Services

The primary focus of the WFD/477 Program is to provide [Employment and Training](#) and related services to assist clients in gaining self-sufficiency through education, job preparation, and obtaining and retaining employment.

The Program may provide assessments, career exploration opportunities, information, education/vocational services, job placement, support services, and the tools necessary for Clients to advance in the workforce.

Workforce Development staff should collaborate with each other on behalf of the Client and may meet with the Client to complete the appropriate assessments, such as the Strong Interest Inventory, [MBTI](#), [CASAS](#) (or [TABE](#)), My Next Move, and O*NET determine needs, and set employment goals.

All Employment and Training and related services are dependent upon the Program budget availability.

On and Off-Site Training

1. Employment-related training projects may be offered on or off site with an approved Project Proposal form approved by the Program Manager.
2. The designated WFD staff member shall coordinate the training and arrange for payment pursuant to the SPIPA Procurement Policy.

College/Vocational Training

1. The Program may assist families with job skills training services directly related to employment goals.
2. The designated WFD staff may assist the Client in completing Federal Financial Aid applications and researching other funding options.
3. Clients may need to be referred for an assessment if there appears to be a disability in order to gain access to disability accommodations.

J. Assessments

1. General

Clients may be assessed to accurately determine their employment/training/education needs or their challenges to achieving self-sufficiency. Assessment tools, if needed, to determine aptitude and interest may be used prior to referring participants to occupational placement or training.

Based on the information gathered at intake and assessment, the Case Manager will assist in identifying challenges that might prevent a client from achieving their goal of self-sufficiency. Any challenges that might be identified will be a basis for the development of an individual plan.

At the WFD Staff's discretion, type and use of assessment tools may vary and/or be waived if warranted.

2. Personal Assessment

a. General

- i. A Personal Assessment is an essential step in the development of the ISP and measures the following:
 - a. Training,
 - b. Skills,
 - c. Prior work experience,
 - d. Personal information related to employability, and
 - e. Other characteristics affecting employability and self-sufficiency.
- ii. If the Client is receiving cash assistance, they must schedule the Personal Assessment interview with the Workforce Development staff within 10 working days of eligibility determination.
 - a. It is advisable to schedule this appointment at intake. If Personal Assessment is not completed within 10 working days, case closure notice will be sent, and they will be given 10 working days to comply or the case will close.
 - b. The Workforce Development staff will complete Personal Assessment Interview prior to the issuing of the second check.
 - c. An assessment is required for each adult in AU, including the Minor HH and Child Only cases. In a two-parent family, both parents must assist in the completion of separate Personal Assessments.
- iii. A Client reapplying for Workforce Development Program Services may be required to complete a new Personal Assessment to identify new possible strengths and barriers.

b. Conducting the Personal Assessment

- i. It is not intended for the Client to complete the Personal Assessment on their own – it is to be used as a dialogue or interview tool for the Workforce Development staff to complete.
- ii. Information may be used to determine potential barriers or exemptions from Work Participation or good cause for not complying with an assigned work activity.

c. Assessment Referrals

- i. Referrals may be mandatory to the clients and shall be placed in their ISP.
- ii. If a Client refuses to comply with a referral for a required assessment, the Workforce Development staff shall suspend services until the assessment is scheduled or completed. If the assessment is not scheduled within 20 days, the case shall close.

- iii. Workforce Development may assist with the cost of these assessments, but it is necessary to attempt to utilize other payment sources first.
- iv. If a Client misses a required assessment appointment without good cause resulting in a cost to the Program, a repayment plan shall be put in place.
- v. Other types of assessments which may be necessary to determine a Client's situation or ability may include:
 - a. Literacy and other educational testing;
 - b. Substance abuse screening;
 - c. Vocational, aptitude, or personality traits testing;
 - d. Domestic violence screening;
 - e. Mental health screening;
 - f. Physical health screening;
 - g. Vocational counseling
 - h. Vocational rehabilitation services; and
 - i. Employment & Employability

K. Individual Service Plan (ISP)

1. General

- a. An ISP is required for every Workforce Development client (Adults and School-Aged Youth).
- b. The ISP is individualized for each client to make progress toward goals and self-sufficiency.
- c. The ISP reflects the results of initial and any ongoing assessments of the Client's skills, prior experience and characteristics affecting employability.
- d. All clients receiving services must cooperate with and sign an ISP.
- e. The Workforce Development staff develops the ISP in consultation with the Client.
- f. The Workforce Development staff, and Client shall take into consideration, the realistic ability of the Client to complete the goals and steps identified on the ISP.
- g. Support Services must be directly related to a goal on their ISP or to a specific Education or Employment opportunity.
- h. Adults without a high school diploma or its equivalent must have this goal included in their ISP, unless exempted.
- i. All major components of the ISP must be documented in TAS Case Notes.

2. Minimum Required Elements of an ISP

- a. Completed ISPs must be entered into TAS under the Plan section.
- b. The Employment, Career, and Education Goals are entries of the Client's respective

preference. The Client is actively involved in the process of selecting employment goals. The steps include:

- i. Goals and Steps,
 - ii. A Description of what will be accomplished during the step with Additional Information,
 - iii. Start Date,
 - iv. Anticipated Completion Date, and
 - v. Actual Completion Date (entered upon completion).
- c. The ISP has space for two goals. There should be at least one step attached to each goal but use good judgment to determine the number of steps necessary to complete the goal.
 - d. It is not necessary to fill in every line on the ISP (Goal or Step), only enter what is necessary to accomplish self-sufficiency. There may be times where a second page to the ISP is needed.
 - e. ISPs shall be signed and dated by the Client and Workforce Development staff.
 - f. A Support Service must be linked to a Goal and/or Step before generating a check/PO.
 - g. Updates should be reflected in TAS in the Plan section and with a Case Note.
 - h. The Plan section of TAS will contain activities required for Workforce Development participation.

3. Adult Goals for ISP

Items which need to be addressed in the ISP will vary from client to client. The elements for an ISP will also vary over time as individual circumstances change. Some common goals in a plan may include but are not limited to:

- Paid Employment
- Subsidized Work in Private Sector
- Subsidized Tribal Employment
- Work Experience
- On-the-Job Training
- Work Search – Job Readiness Assistance
- Vocation Training and Education
- Job Skills (Employment-Related Training)
- Education Related to Employment
- Life Skills Training in preparation for job skills training
- Attending High School or GED Completion

- Post-Secondary Education
- Volunteer – Employment & Training
- Approved Community Service
- Cultural and Traditional Activities that would reasonably lead to self-sufficiency, may include but are not limited to, weaving, carving, beading, storytelling, traditional hunting and gathering activities including preparation for hunting/harvesting, processing and storing of fish, shellfish, wild game and other traditional foods
- Substance Abuse Counseling

4. Youth Goals for ISP

The youth elements for an ISP will vary over time as individual circumstances change. Some common goals in a plan may include but are not limited to:

- a. Completing K-12 education;
- b. Addressing Post-secondary education/vocational education;
- c. Addressing attendance;
- d. Addressing extra-curricular activities;
- e. Health and wellness checkups;
- f. Addressing transportation issues;
- g. Addressing youth employment issues;
- h. Educational Services
- i. Tutoring Services
- j. Summer Employment
- k. Work Experience
- l. School internships
- m. Vocational Exploration
- n. Cultural education
- o. Counseling referral

5. Client Accountability and the ISP

Clients are subject to all WFD Services being suspended for the following:

- a. Failing to cooperate in developing or updating the ISP;
- b. Failing to sign the completed ISP; or
- c. Failing to comply with a condition of the ISP without good cause.

6. Updating the ISP

At a minimum, the ISP should be reviewed with all clients every three months, or when education or employment circumstances change. For ISPs that have no changes upon reevaluation, the Workforce Development staff and Client must sign and date the ISP and change the Plan Next Review Date and Actual Review Date in TAS. Workforce Development Staff shall Case Note all details of every update.

7. Changes to the ISP

- a. The Client and/or Workforce Development Staff may request to change the ISP at any time. Changes are made only with the approval of the appropriate Workforce Development staff.
- b. In considering a request for a change to the ISP from a Client, the Workforce Development staff should consider:
 - i. Whether the changes are related to an attainable career goal.
 - ii. Will not adversely affect participation in ISP activities;
 - iii. The ability of the client to carry out the requested change with current resources;
 - iv. Whether the change is due to temporary circumstances; and
 - v. Other areas/steps of their plan that may be affected.

8. Guidance for Individual Service Plan (ISP)

- a. Use the Assessment(s) as guidance for Family Strengths and Resources, Barriers, and Skills & Abilities.
- b. These may be used to determine the goals in the next few steps.
 - i. When setting Education, Employment, and Career goals, keep in mind how attainable and realistic a client's goals are.
 - ii. Goals are not individual steps, they are broad and long-term.
 - iii. Goals may be broken down into smaller, more attainable goals, such as attaining a BA before attaining an MA in college.
- c. The Educational goal is the end result for a client's educational goals.
 - i. This can include no further educational goals and go as high as any level of education reasonably related to a client's Career goals.
 - ii. Clients may continue their educational goals after they are off of Workforce

Development if they are self-sufficient in their employment.

- d. The Employment goal is the next job a client is qualified to work in, taking into consideration their current training, skills, abilities, experience, and Career goals.
 - i. This may often be entry-level positions related to a career but may also include any job that will help the client with income and instill good work habits.
 - ii. Employment goals may change at any time. Workforce Development staff should take into consideration a client's life circumstances that affect a client's employment and employability.
 - iii. A client may choose Undecided as an employment goal but should work on developing a goal in the plan.
- e. The Career goal is where the client will see themselves when they are self-sufficient and off of Cash Assistance.
 - i. They are broad job clusters that describe industries of interest to a client.
 - ii. They do not describe a job title per se, but a profession, such as social work or business management.
- f. It is not necessary to do a new plan in TAS for every ISP update. It is also not necessary to do a new Goal/Step entry. The next review date and actual review date should change.
- g. To update a plan in TAS, the Goal Steps may be updated or, if the case closed or goal was abandoned, changed to Complete or Did Not Complete.
- h. Once a Goal Step is changed from Current to Completed or Did Not Complete, the Outcome must also be selected from the list of options in TAS. These will vary based on the type of Goal Step.
- i. New plans may be done if a client's goals change, and the steps will need to be re-entered as well.
- j. After the goals are decided, the client and Workforce Development staff will determine the steps necessary to achieve each goal.
- k. Steps may also stand alone and include any activity that will encourage a client's self-sufficiency, such as activities, classes, events, etc.
- l. Case Managers and other Workforce Development staff may also be assigned steps in the ISP to complete on the client's behalf, such as referrals.
- m. Maintaining compliance with the Program may be one of the steps, such as turning in documentation on time and other client responsibilities.

L. Annual Recertification

- Annual recertification must be completed every year for every client.

- The next review date should be set one year from the most recent review date.
- Current clients shall renew their proof of residency, releases of information, and all expired eligibility documents annually, or their case shall be closed.
- Clients shall be notified at least 15 days before their review date and will have until the end of the month to renew their application.
- Clients who do not renew their application shall be sent a 10-day closure notice.

Section 3 - Non-Financial Service

A. **Non-Financial Services**

A variety of non-financial services may be provided to all youth and adults. Our focus is helping our clientele achieve economic self-sufficiency and not relying on public assistance. These services do not have income guidelines but may have other requirements depending on the service provided. These non-financial services may include but are not limited to:

- Basic Literacy
- Financial Literacy
- GED Preparation and High School 21

Job Readiness Training will include but is not limited to: employer expectations, acceptable work behavior, personal motivation, life skills, communication skills, resume and job application preparation, interviewing techniques, employee rights and responsibilities, salary and fringe benefits awareness, consumer education (budgeting, credit, banking, etc.), and labor market information

- Resume building
- Capacity building
- Interviewing Techniques
- Job Club
- Job Boards/Labor market information
- Application Assistance
- Remedial Education Services

Vocational Training will consist of formalized institutional training, which will provide eligible program participants with the technical skills, and information required to perform a specific occupation or group of jobs. A referral will be made to Higher Education for these services. This activity will only be provided to those individuals who do not have a marketable skill and will only be authorized for those occupations for which there is a current demand.

- Vocational Rehabilitation
- Job Retention assistance

The WFD staff will conduct the following activities to assist participants with access to unsubsidized job openings:

- Maintain an organized listing of available jobs
- Communicate with employers to locate new job openings
- Promote program services to employers

- Referral of job ready participants to job openings
- Refer clients for financial services, if eligible

The Workforce Development Program will refer clients to apprenticeship programs within the surrounding area; such as, Iron Workers, Carpenters, Cement Finishers, Mill Wright, Painters, and truck drivers. The program will work closely with Tribal Employment Right Offices (TERO), which offers vocational training/placement in select fields.

For participants who are unable to participate in the programs offered under the Workforce Development Program due to a learning disability or other disability a referral will be made to the Tribal Vocational Rehabilitation Program and/or the Washington State Division of Vocational Rehabilitation (DVR) Offices.

The services described in the above sections covering the development of and ISP and non-financial services are intended primarily for participants for whom an employment and/or educational goal is established during the assessment process.

Some applicants to the WFD Program may be considered “unemployable individuals” due to multiple barriers that have impacted their ability to maintain employment or complete a training program.

If the client is unlikely to return to work or complete a training program, assistance and referrals to be accepted under the Social Security Disability Program will be required. The WFD Program is dedicated to helping clients in accessing the services that fit their needs, including but not limited to, advocacy and referrals to apply for Social Security Disability Insurance benefits.

Section 4 – Financial Services

A. ReliaCard

Client services that are available through the ReliaCard include:

- Monthly Cash Grants
- Policy/Project/Proposal Incentives when receipts are not required
- Child Support Pass-Thru
- WEX Payments
- Supportive Services/Incentives for Cash Assistance Clients

For Cash Assistance clients, funds may be issued on a ReliaCard only in the instance that a check or PO cannot be used for a Support Service.

ReliaCards are available to persons 14 years or older with a maximum deposit limit of \$4,000.

Receipts will be required for all purchases within 15 days of the deposit. Staff must case note that ReliaCard was used, and that receipts will be required.

If receipts are not received within 15 days, a Receipts Past Due notice will be sent to the client out of TAS, giving them 15 more days to turn in receipts or they will owe the program the total amount of unaccounted funds.

If the funds deposited on the ReliaCard are misused:

- No incentives or Support Services will be issued until the amount is repaid to SPIPA.
- No incentives or Support Services will be issued on ReliaCard for vendors that will receive a check or PO for at least one year.

If receipts are not returned by the due date:

- No Support Services will be issued in any form for 3 months.
- If the client is receiving Cash Assistance, the amount will be recouped from their grant via a repayment plan.
- No incentives or Support Services will be issued on the ReliaCard until receipts are received, or the amount has been repaid in full.
- If receipts are not received, Support Services will no longer be issued on ReliaCard.

B. Support Services

Support services are for clients receiving employment, training, and related services only. Any Client has the right to apply for Support Services but they are contingent on the following:

- Services must be directly related to an approved work activity, education, or

employment goal in the ISP;

- Support Services are contingent on the availability of funds;
- Where possible, costs of the supportive service will be shared with the client
- All of the above shall be clearly documented in TAS using the appropriate Standardized Case Note template.

Support service payments are not automatic or an entitlement. Each request shall be reviewed for:

- Client monthly budget
- Recurrence of need
- Partner Agency Service Provider; and
- Other available resources.

Clients shall complete and submit a Support Service Request Packet that clearly documents the need. It shall include other resources the Client utilized. Client monthly budget sheets may not be required for full-time students and cash assistance child only cases when the service is for the benefit the child. Case Manager and Site Manager shall ensure request packet is complete prior to submitting for final processing. Support Services Request Forms shall be processed within ten business days of receipt of the form and all necessary backup documentation.

The term "lifetime" refers to the total amount of time a Client receives benefits, not individual periods (instances, cases, or intakes) of WFD Service. Support Service expenditures shall be reasonable and necessary. No luxury items shall be purchased by the Program. Support Service checks will not be issued to the client, only to the vendor providing the service.

Exceptions to the amount limits in policy may be requested for the client unless policy states otherwise. The Case Manager shall document the reason for the exception, and the Site Manager shall approve or deny and forward to the Program Manager for the final decision.

Who Is Eligible for Support Services?

- Youth and adults who have an active ISP
- Clients must be eligible for WFD Services and in compliance with their ISP to be eligible for Support Services.

Who Is Not Eligible for Support Services?

- Clients who are not in compliance with their ISP;
- Clients whose request is not directly related to a work activity, education, or employment goal in their ISP; and
- Non-WFD clients.

Requesting Support Services

- Clients shall submit a completed Client Support Service Request.
- Case Manager shall verify that information on the Client Support Service Request is accurate and complete.
- WFD is the payer of last resort, not a primary resource, and it is necessary to document other resources utilized.
- Case Manager shall submit the completed request through Smartsheet.
- Case Manager shall clearly document request in TAS Case Notes which clearly demonstrates how the request links to the Individual Service Plan, an approved activity, education, or employment opportunity.

Misuse of Support Services

Future support services will be denied if:

- The purchase order is not used for its intended purpose;
- The amount spent exceeds the original PO;
- The Client was ineligible to receive the support service they received.
- The Client misrepresented or falsified information to obtain support services he/she was otherwise ineligible for.
- The Client fails, without good cause, to complete the Job Skills training they have agreed to participate in and that has been paid for by SPIPA.
- Any other reason determined by the Program Manager to be a misuse of support services.

Recoupment of Funds Paid for Support Services that are Misused or Obtained by Providing False Information

- If the client misused a support service, did not complete the approved ISP activity, or provided false information in order to obtain a support service, he/she shall be required to reimburse the Program for any funds received or paid on his/her behalf to a vendor or third party.
- For Cash Assistance- No other Support Services are allowable until a repayment plan has been entered and clearly Case Noted in TAS.
- For WFD Clients- No other Support Services are allowable for up to one (1) year and/or until repayment in full has been received and clearly Case Noted in TAS.
- Client may still be eligible for Emergency Support Services if expressly approved by the Program Manager.

Staff Requirements

WFD staff shall document in TAS Case Notes: the reasons for the denial of future support

services, whether or not repayment is required, and any other information related to the denial.

If repayment is provided directly to staff, staff will provide a receipt to the client for the cash, check or money order received and forward the payment to SPIPA Fiscal Department with a copy of the Required Repayment Standardized Case Note.

The client may make payment directly to the IPC by mail or dropping it off at the front desk. SPIPA Staff will provide a receipt for the funds received either in person or by mail.

Support services are prioritized for low-income participants and for urgent and emergent needs. Types of support services include, but are not limited to, the following:

- Educational and Tutor Services
- Job Skills Training
- Transportation
- Driver License
- Childcare Co-Pay Assistance
- Clothing for School or Employment
- Professional License
- Tools and Equipment for work or training purposes
- Self-employment
- Auto Insurance
- Personal Care Items (Related to Work/Education/Training)
- Some Housing Expenses
- Basic Medical & Dental
- Vehicle Repair

1. Educational and Tutor Services

The Program may assist youth and adult clients with educational and tutoring services that are directly related to their educational goals as follows:

- a. Cost of tutoring services as needed
- b. Books or supplies for classes.
- c. Youth Graduation
 - i. SPIPA WFD may pay for Cap/Gown and basic Announcements only.
 - ii. Cash incentives, class rings, senior pictures, and anything else are not allowable.

2. Job Skills Training

The Program may assist clients with job skills training services that are directly related to employment and/or education listed below.

a. Tuition for Job Skills Training (vocational, post-secondary, self-employment classes)

- i. Authorize tuition support services for no more than one quarter until financial aid has been granted or denied by the institution. There is no exception to this policy. If financial aid has been denied, more quarters may be approved.
- ii. If the Client has completed the financial aid process, and financial aid has been denied, to continue receiving tuition the Client shall submit proof of an appeal and a written justification that includes a plan for continuing their education, which will be staffed among the Workforce Development Team and Site Manager.
- iii. Client shall document completion of Financial Aid process.
- iv. Client shall demonstrate the lack of other available resources such as denial letters from Financial Aid, Tribal Education Offices, TERO Office, etc.
- v. Clients shall submit grades at the end of each quarter/semester.
- vi. A Client's support service for tuition shall be discontinued if their current GPA falls below a 2.0 while Workforce Development is paying for tuition. They will be eligible for this service again after one quarter of self-pay and improvement of GPA.
- vii. If financial aid is granted by the institution and The Program has already paid the tuition, the Client shall reimburse The Program for the total amount that was paid for tuition. Client shall not receive any additional Job Skills Training Support Services until repayment has occurred.

b. Books, supplies, and workbooks.

- i. Authorize actual cost.
- ii. Client shall submit class schedule, flyer or documentation from school.
- iii. Client shall submit a quote for books or workbooks.

c. Lab and activity fees.

- i. Authorize actual cost.
- ii. Client shall submit class schedule, flyer or documentation from school showing fees.

d. Fees for learning disability tests.

- i. Authorize actual cost after verifying Medical Benefits shall not cover assessment.

- ii. If Client no shows for appointment, without good cause, a repayment plan shall be developed to recoup lost fees.

e. Short-term workshop fees (registration fees).

- i. Short term workshops are authorized at actual cost.
- ii. Client shall submit class schedule, flyer or documentation from school.
- iii. Client shall submit a quote for cost
- iv. Documentation of successful completion of the workshop shall be provided by the client to the case manager.

f. Testing Fees For Education & Training

- i. Authorize actual cost.
- ii. If Client no shows for test, without good cause, Client shall be placed on a repayment plan.
- iii. If a Client fails a test, they shall be allowed two retakes. Other retakes may be considered with Program Manager's approval.

g. Computers

- i. There shall be a documented need for request.
- ii. Only families with members from Kindergarten through college may receive this service, if distanced/virtual learning is required.
- iii. Three written quotes from three different vendors are required, unless the client is using a preferred vendor that will accept SPIPA purchase orders or the Tribal IT Department makes a recommendation for purchase from a specific vendor.
- iv. Cost should include necessary hardware and software. The Program shall not pay for warranties.
- v. Shall be reasonable and may not exceed \$1,000 per client in a lifetime.
- vi. Client may select between a Desktop, Laptop, or other school district recommended device.
- vii. If a Client fails to complete job skills training/college they have requested a computer for, without good cause, the Client is required to develop a repayment plan. No other Job Skills training shall be authorized until repayment plan is has started.
- viii. Other as approved by the Program Manager

h. Case Manager shall clearly document all requests in Case Notes in TAS.

The Case Note shall contain at a minimum the following information: type of services requested, how the service links to the Individual Service Plan or Work Activity, type of documentation in the file, name of Client service is for, cost of

service, name of vendor and other types of resources attempted to use.

3. Other as Approved by Program Manager

a. Requirements for Other:

- Pay the actual cost based on approved activities.
- Client shall submit documentation.
- Client shall demonstrate the lack of other available resources, such as denial letters from financial aid, Tribal Education Offices, TERO Office, etc.
- Lifetime limit in this category is \$2,000.00 per client.
- Additional amounts may be approved on a case-by-case basis by the Program Manager.
- The Case Note shall contain at a minimum the following information: type of services requested, how the service relates to the Individual Service Plan or Work Activity, type of documentation in the file, name of Client service is for, cost of service, name of vendor and other types of resources attempted to use.

4. Transportation

Lack of transportation is one of the most common barriers to employment. Transportation services are provided when Clients need to travel to and from any assigned work activity.

Transportation services may include, but are not limited to:

- a. Public transportation at actual cost
- b. Van transportation
- c. Gasoline vouchers for personal vehicle
- d. Carpool
- e. Taxi and private carriers
- f. The program may not pay for:
 - i. Breathalyzer installation costs
 - ii. Monthly breathalyzer costs

Requirements for Transportation:

- Clients in approved work and education activities may receive gas vouchers not to exceed \$100 in a month with a maximum of \$1200 per year.
- When more than one household member participates in a required activity, each Client can receive transportation assistance.
- Copies of the Client's valid driver license, current car insurance and registration in Client's name shall be in the physical file. If all documents are not present,

gas voucher may not be issued.

- Transportation requests shall include a printout of the Client's license status report from DOL.
- If gas vouchers are issued to a person without all documentation, a repayment plan shall be established.
- When no other transportation is available, a Client may receive reasonable transportation expense through another individual or private carrier (see Definitions). We will need verification of the driver's license, insurance, registration, and purchase orders may only be made out to the client.
- Additional amounts may be approved on a case-by-case basis by the Program Manager.
- Case Manager shall clearly document request in Case Notes in TAS.
- The Case Note should contain at a minimum the following information: type of services requested, how the service links to the Individual Service Plan or Work Activity, type of documentation in the file, name of Client service is for, amount of service, name of vendor and other types of resources attempted to use.

5. Driver License / Vehicle Registration / Driver Training or Education

Requirements for Driver License:

- a. Authorize payment for driver education/training for a new license or required for reinstatement of license when required in ISP at actual cost.
- b. Authorize payment of vehicle registration for 1 vehicle per client at actual cost.
- c. Case Manager shall clearly document request in Case Notes in TAS. The Case Note should contain at a minimum the following information: type of service requested, how the service links to the Individual Service Plan or Work Activity, type of documentation in the file, name of Client service is for, amount of request, name of vendor and other types of resources attempted to use.

6. Automobile Insurance Expense

(Work/Training/Education only) Insurance payments may be authorized for a vehicle registered to the Client who is the primary driver of the vehicle. The Client shall provide a copy of the vehicle registration and a valid driver license. When more than one person in the AU is receiving WFD services, insurance expenses may be authorized for separate vehicles.

Requirements for Automobile Insurance Expenses

- a. Expenses shall be reasonable and necessary and prioritized for low-income clients.
- b. Only liability insurance is allowable unless there is a documented reason that a different type of insurance is required.

- c. The program may not pay for SR22 insurance costs.
- d. The Program may authorize up to \$2,000 in insurance costs per vehicle for work activities every 12 months for a maximum of 24 months.
- e. The Program may authorize up to \$750 in insurance costs per youth client **under 18 years old** every 6 months if transportation is needed for documented activity as part of their ISP.
- f. If a different type of insurance is required, the Program may only pay up to \$2,000.
- g. Additional amounts may be approved on a case-by-case basis by the Program Manager.
- h. Adults and youth receiving auto insurance shall provide the following: Three written quotes from three different vendors (unless renewing an established policy), valid driver license and registration in the appropriate name. Quotes from the same broker will not be accepted as separate quotes. (e.g., Vern Fonk, Progressive, etc.)
- i. Case Managers shall clearly document insurance requests in TAS Case Notes. The Case Note should contain at a minimum the following information: type of service requested, how the service links to the Individual Service Plan or Work Activity, type of documentation in the file, name of Client service is for, amount, and other types of resources utilized.

7. Vehicle Repair

The Client shall need a vehicle to be working, attending school, or meeting approved work participation activities.

Requirements for Vehicle Repair

- a. Prior to authorizing repairs the Client shall provide the Case Manager with a copy of the vehicle registration in their name, a copy of a valid driver license and proof of current insurance.
- b. Client may be eligible for vehicle repair assistance no more than once each year.
- c. Three written quotes are required from different certified auto repair shops or mechanics stating repairs and estimated cost, unless the client is using a preferred vendor that will accept SPIPA purchase orders or the vehicle cannot be moved to another repair shop without incurring additional costs.
- d. Total repairs for a Client's vehicle, including repairs made under the Support Services Section of this manual, may not exceed the vehicle's value in its lifetime. Value of vehicle shall be researched, reasonable and documented in file. NO exception to this policy.
- e. Use Kelley Blue Book or National Automobile Dealers Association when possible.
- f. Use appropriate condition of vehicle. For example, excellent or very good

condition may not be used with vehicles that are in need of mechanical repair.

- g. Use the retail or private party sale price.
- h. Vendors will need to complete a W-9 for our files when appropriate.
- i. If the client is confident that only the parts need purchases and they or someone they know is fully capable of the repairs, costs may be approved at the case manager's discretion. The program will not be responsible for any damages resulting from unprofessional repairs.
- j. Pay only for the cost of necessary repairs that return the vehicle to a safe and reliable working condition. Repairs for multiple vehicles for a Client in a 12 month period shall not be allowed, unless there are two Clients in the family, and both are engaged in valid work activities.
- k. Case Notes shall include, at a minimum, the following information: crisis causing the need, type of documentation in the file, name of Client service is for, other types of resources attempted, how the service relates to the Individual Service Plan or Work Activity, value of vehicle versus cost of repair, vehicle make, model and year, and information on the quotes on file including vendor name.

8. Childcare Co-Pay Assistance

The Program may assist client with the costs of **Childcare Co-Pay Assistance** for the cost of childcare.

Requirements for Childcare:

- a. The Program is a secondary resource for Childcare. Client shall document other resources attempted such as DSHS Childcare and Tribal Childcare.
- b. Client shall be in an education, training or work-related activity.
- c. The Client shall provide documentation of childcare fees/co-pays. No late pick up fees shall be allowed.
- d. SPIPA Workforce Development shall not pay any cost that was incurred prior to authorization of service.
- e. Authorize exact cost not to exceed \$1000 per client within a twelve-month period.
- f. Additional amounts may be approved on a case-by-case basis by the Program Manager.
- g. Case Manager shall clearly document request in Case Notes in TAS. The Case Note should contain at a minimum the following information: type of service requested, how the service links to the Individual Service Plan or Work Activity, type of documentation in the file, name of Client service is for, name of vendor, amount and other types of resources attempted to use.

9. Clothing

The Program may assist Clients with the purchase of clothing when the Client is in an education, training, or work-related activity. **This is not a general clothing allowance for youth or adults.**

Requirements for clothing:

- a. Clothing for interviews/job search up to \$450 may be provided no more than two times per year.
- b. Clothing for employment opportunities, education, and/or training up to \$300 may be provided no more than two times per year. Up to \$600 may be approved if a specific type of clothing is required to attend work or training, quotes or estimates will be required, as well as supporting documentation of the need for such clothing. Clothing assistance enables the client to be appropriately dressed at their workplace or educational/training site, and does not include specifically required workwear which is covered separately below.
- c. Specialized employment-related work wear for employment opportunities, education, and/or training (i.e., specialized footwear, outerwear, and protective clothing) may be provided at actual cost, as needed, and is not included in the clothing for employment opportunities, education, and/or training limits. Such specialized work wear will require a written quote and/or estimate.
- d. Clothing purchased must be appropriate for the work or school activities identified in the ISP. Case Manager's shall confirm pending interview or employment opportunities, education, and/or training activities.
- e. Additional amounts may be approved on a case-by-case basis by the Program Manager.
- f. Case Manager shall clearly document request in Case Notes in TAS. The Case Note should contain at a minimum the following information: type of service requested, how the service links to the Individual Service Plan or Work Activity, prospective employer or employer, name of Client service is for, name of vendor, amount and other types of resources attempted to use.
- g. Case Manager shall update ISP if employment or education is new and have continuation/completion goals and steps in the ISP.
- h. Case Manager shall update Work History if the client is requesting a support service for a new job to include at a minimum: name and location of employer, position, and wage.

10. Professional License/Union Dues

Professional licenses encompass a range of occupations.

Requirements for Professional License/Union Dues

- a. Pay the actual cost.

- b. Must be attached to current employment or job offer.
- c. Backup documentation should include price and description.
- d. Case Manager shall clearly document request in Case Notes in TAS. The Case Note should contain at a minimum the following information: type of service requested, how the service links to the Individual Service Plan or Work Activity, type of documentation in the file, name of Client service is for, name of vendor, amount and other types of resources attempted to use.

11. Special Tools and Equipment

Some occupations and trades require special tools or equipment, such as safety equipment, boots, or gloves. Authorize the cost of special tools and equipment that are required for the Client to train for or begin working.

Requirements for Special Tools or Equipment:

- a. Authorize actual costs for special tools or equipment expenses.
- b. A quote and/or estimate will be required.
- c. Tools and/or equipment shall be either work or training related and cost shall be reasonable and provided at actual cost.
- d. If a Client fails to maintain employment or training, without good cause, that Client shall be assigned a protective payee and a repayment plan shall be developed.
- e. Case Manager shall clearly document request in Case Notes in TAS. The Case Note should contain at a minimum the following information: type of services requested, how the service links to the Individual Service Plan or Work Activity, type of documentation in the file, name of Client service is for, name of vendor, amount and other types of resources attempted to use.

12. Small Business/Self-Employment Assistance

It is the intent of the SPIPA Workforce Development Program to assist all Clients who wish to pursue the startup of a small business or self-employment. Financial assistance is contingent upon reasonableness and availability of funds. This policy is subject to ongoing review and revision as unique situations and opportunities arise. While every attempt will be made to provide consistency and equity, requests and requirements will be addressed on a case-by-case basis.

Requirements for Small Business/Self-Employment Assistance

- a. All clients interested in pursuing small business startup and/or self-employment may be required to participate in the following prior to receiving any financial assistance:
 - i. Take a variety of business readiness assessments
 - ii. Meet with the Entrepreneurial Development Specialist

- iii. Have the small business and/or self-employment goals reviewed by the Business Development Team and
- iv. Attend any identified workshops and trainings that support their small business and/or self-employment.
- b. If a small business startup or self-employment is the goal of the client, it must be included in the Individual Service Plan.
 - i. ISP may include any or all of the following:
 - 1. Client must be working on a comprehensive business plan; and/or
 - 2. Take assessments, classes or workshops as require by the Entrepreneurial Development Specialist and or Business Development Team; and/or
 - 3. If business is already established, a copy of their business license and supporting documents are required
 - c. Client may be referred for professional assistance with developing a business plan (e.g.: SBA, Enterprise for Equity, local incubator, consultant, or business institute).
 - d. A copy of the business plan and or license shall be kept in the file.
 - e. Once the client has been approved by the Business Development Team, the program may assist with:
 - i. Up to \$4,000.00 for supplies or services related to the success of the client's small business, including but not limited to the following as approved by the Business Development Team:
 - 1. Business License
 - 2. Insurance
 - 3. Startup supplies and equipment
 - 4. Professional Consulting Services, i.e., taxes, finances, marketing, etc.
 - 5. Exhibit fees/costs to promote and/or sell their merchandise and/or products
 - ii. The Program is unable to assist with construction, i.e., build, electrical, plumbing, water, land development, or other infrastructure, etc.
 - iii. If a client participates in and completes the Native Entrepreneur Academy (NEA), they may be eligible for the following incentives:
 - 1. Dependable Strengths Workshop – \$100
 - 2. Money 101 Workshops - \$150
 - 3. Business Readiness Workshops - \$250
 - 4. Business Planning Program - \$500
 - 5. Reach Your Dreams Workshop (Youth only) - \$100
 - iv. Client must turn in a copy of the Certificate of Completion to the Entrepreneur Development Specialist to receive the NEA incentive
 - 1. The incentive must be used to support the client's small business or self-employment.
 - 2. If the client is working towards establishing their small business, the

- incentive(s) will be held until they obtain their business license; the NEA incentive may be used to obtain their business license.
- 3. Receipts may be required to ensure purchases are used for the business.
 - v. Incentive will be processed to an approved SPIPA vendor that supports the client's small business and/or self-employment. Incentives will not be issued directly to the client or the business.
 - vi. Youth Incentive will be processed to an approved SPIPA vendor
- f. Lifetime limit in this category is \$4000.00 for supplies or services and up to \$1100.00 for the NEA incentives per client and/or per one active business that is registered in the client's name.
- g. Case Manager shall clearly document request in Case Notes in TAS. The Case Note should contain at a minimum the following information: type of services requested, how the service links to the Individual Service Plan or Work Activity, type of documentation in the file, name of Client service is for, details of business plan, amount and other types of resources attempted to use.

13. Personal Care Items

Payment for personal care items is allowable when related to work/education/training and there is no other resource available. Case Manager shall confirm pending interview or employment opportunities, education, and/or training activities.

Requirements:

- a. Authorize up to \$150 per member of the household, once per quarter.
- b. Authorize up to \$50 per client for haircuts in preparation for interviews, work, or education activities up to two times per year.
- c. Authorize up to \$100 per child for diapers, pull-ups, and wipes no more than six times a year. Additional amounts may be approved with a documented reason why a higher amount is required.
- d. Additional amounts may be approved by the Program Manager.
- e. Case Manager shall clearly document request in TAS Case Notes. The Case Note should contain at a minimum the following information: type of service requested, how the service links to the ISP or Work Activity, type of documentation in the file, Client name, amount, and other types of resources utilized.

14. Relocation Expenses

Pay the cost of a temporary or permanent move to a distant community if doing so enables the Client to accept a paid job, take part in specialized education and training or work experience activity.

Requirements for relocation:

The Case Manager shall work closely with the Client to itemize the actual costs prior to approval.

- a. Documentation shall be in file of legitimate employment offer or training that is more than 1 town away from their current residence or the client has no home. Employment offer or training must be within 30 miles of the new residence. Exceptions on distances may be granted by Program Manager within reason.
- b. Use the least costly means of relocation.
- c. What to pay?
 - i. Expenses shall be reasonable and may include: fuel, housing (security deposit, first and last month rent), utility set up, and hotel/motel.
 - ii. May not issue per diem for food as it would be a duplication of assistance.
 - iii. Moving trucks or vans may be approved as a reimbursement. Estimates will need to be approved before the cost is incurred, and only the amount on the estimate may be approved for reimbursement. Clients will need to pay for the moving vehicle and provide a receipt of the cost.
- d. How to issue relocation expenses?
 - i. Case Manager should issue checks directly to vendor.
 - ii. Case Manager may issue gas vouchers or cards, however all required documentation shall be in file.
 - iii. Client must demonstrate that they can afford housing on an ongoing basis. Requests for housing with monthly payments that the client cannot fit in their monthly budget will not be approved.
 - iv. Approval shall be on a case-by-case basis and only available to a family once in a lifetime.
 - v. Case Manager shall clearly document request in Case Notes in TAS. The Case Note should contain at a minimum the following information: type of services requested, how the service links to the Individual Service Plan or Work Activity, employer/school, type of documentation in the file, name of Client service is for, name of vendor, amount and other types of resources attempted to use.

15. Emergency Household Necessities

Assistance with household necessities is allowable as long as it is non-recurring and there is no other resource available. Client may be eligible for household necessities assistance no more than once every three years. Household necessities may include reasonable items such as standard: bedding, pots, pans, alarm clock, dishes, appliances, beds, and cribs, and cleaning supplies. Household necessities do not include items such as unnecessary electronics, toys, and/or other luxury

items. Household necessities may include reasonable items such as standard: bedding, pots, pans, alarm clock, dishes, appliances, beds and cribs, and cleaning supplies. Household necessities do not include items such as unnecessary electronics, toys, and/or other luxury items.

Requirements for Household Necessities:

- a. Beds or cribs should only include mattress/bedsprings, bedding, and basic frame. No headboards or footboards. At least three estimates from three different vendors must be included, or a single quote when using a preferred vendor. All quotes must be reasonable. Beds and bedding per client should not exceed \$800.
- b. Large appliances and furniture require at least three estimates from three different vendors, or a single estimate when using a preferred vendor. Estimates should include used or refurbished options if available. Appliances per client household should not exceed \$1,500.
- c. Other household and small appliances necessities per family should not exceed \$300.
- d. Child car seats may be provided up to \$500 per year and must meet legal requirements for age and size of child. Quotes are required.
- e. Fire Extinguishers, Smoke Detectors, Carbon Monoxide Detectors, and other safety requirements may be approved at actual cost.
- f. Any additional amounts requested shall be reviewed by the Workforce Development Team for eligibility. Final approval shall be determined by the Program Manager.
- g. At a minimum, Case Notes in TAS shall include: the crisis situation which created the need, name of Client receiving the service, name of vendor, amount of request, and what other resources the Client utilized.

16. Emergency Housing Expenses

Clients shall have a crisis situation that is urgent. Examples of emergency situations include, but are not limited to:

- a. Domestic violence/sexual assault cases; or
- b. Loss of employment or income;
 - i. Unexpected emergency expenses;
 - ii. Emergency shelter and temporary housing is not available at emergency agencies; or
 - iii. Client has been served with an eviction or unlawful detainer notice.

Requirements for Emergency Housing Expenses:

- a. Expenses shall be authorized at actual cost up to four times per year.
- b. Eviction, unlawful detainer, three-day pay, delinquent mortgage statement or

foreclosure notice shall be attached to Emergency Support Service request when eviction is being threatened.

- c. Landlord shall provide W-9 form which can be faxed or delivered to the vendor (which is to be documented in the Vendor section of TAS).
- d. Past due mortgage statement or foreclosure notice. Must be in clients' name.
- e. In the case of DV, documentation shall be in file and clearly noted in TAS Case Notes. Domestic Violence Prevention Programs should be accessed before any WFD Services.
- f. If hotel is requested, Case Manager shall document in TAS Case Notes that no shelter or temporary housing solution is available. Client shall continue to check in with shelters to get on their waiting list and for availability. Case Manager shall verify that the Client complies.
- g. Any additional amounts requested shall be reviewed by the Workforce Development Team for eligibility. Final approval shall be determined by the Program Manager.
- h. At a minimum, Case Notes in TAS shall include: the crisis situation which created the need, name of vendor, amount of request, and what other resources the Client utilized.

17. Utilities

Utility payments will be authorized for emergency situations. If a utility request is directly related to and necessary for an education or employment activity, it may be considered for WFD clients. Allowable Utilities are:

- a. Natural Gas;
- b. Water;
- c. Electricity;
- d. Land based telephone for the home or a cell phone with a fixed fee if the Client is unable to qualify for land based phone;
- e. Propane; and
- f. Wood or Pellets

Requirements for Utility Expenses

- a. Utility assistance may be provided up to \$1,500 per year.
- b. Any additional amounts requested shall be reviewed by the Workforce Development Team for eligibility. Final approval shall be determined by the Program Manager.
- c. It may be necessary to prorate the payment if the Client shares household expenses with a roommate.
- d. At a minimum, Case Notes in TAS shall include: the crisis situation which

created the need, name of vendor, amount of request, and what other resources the Client utilized. If related to an education or employment activity, the note must also include how the service directly relates to and is necessary for the activity.

18. Food

This Emergency Support Service is only for emergency situations. The Program does not pay for food on a recurring basis.

- a. Requirements for Food Expenses
- b. Emergency Support Service for food expenses is authorized up to \$150 per household member for a maximum of \$600 up to three times per year.
- c. Case Manager shall confirm if the Client is receiving food benefits from the state or Tribal food program. Recipients of food benefits from the state or Tribal food program may qualify for emergency food assistance in crisis situations.
- d. Clients shall utilize food banks and Tribal food programs prior to requesting Emergency food expenses.
- e. Any additional amounts requested shall be reviewed by the Workforce Development Team for eligibility. Final approval shall be determined by the Program Manager.
- f. At a minimum, Case Notes in TAS shall include: the crisis situation which created the need, name of vendor, household size, amount of request, results of Home Visit, and what other resources the Client utilized.

19. Emergency Clothing

This is not intended to be a clothing allowance. The program may assist Clients with the purchase of clothing if necessary to alleviate a crisis situation (i.e., a child removed from their home without clothing, or loss of clothing due to a disaster). Outgrown clothing alone is not an eligible reason for a clothing-related Emergency Support Service as it is considered a duplication of assistance.

Requirements for Clothing-Related Emergency Support Service:

- a. Clothing, shoes, and outerwear should not exceed \$500 per eligible Client within a 12-month period.
- b. Any additional amounts requested shall be reviewed by the Workforce
- c. Development Team for eligibility. Final approval shall be determined by the Program Manager.
- d. At a minimum, Case Notes in TAS shall include: the crisis situation which created the need, name of Client receiving the clothing, name of vendor, amount of request, and what other resources the Client utilized.

20. Emergency Other

The Client is in a crisis situation that affects the family's immediate health and safety.

Requirements for Emergency Support Service Other

- a. Requests shall be reviewed by the Workforce Development Team for eligibility. Final approval shall be determined by the Program Manager.
- b. At a minimum, Case Notes in TAS shall include: the crisis situation which created the need, name of vendor, amount of request, what is being requested, and what other resources the Client utilized.
- c. Three written quotes from three different vendors are required to be submitted with request depending upon the item(s) needed by the client or family, unless the client is using a preferred vendor that accepts SPIPA purchase orders.

21. Youth Extracurricular

- a. Costs for extracurricular activities for youth may be approved so long as they support the 4 purposes of TANF/Cash Assistance. Examples include costs related to sports, clubs, and events outside of the student's curriculum.
- b. Requests shall be reasonable and not exceed \$500 per child per year.
- c. Only costs necessary to participate are allowable, no optional or luxury items or services may be approved.
- d. Case Manager shall clearly document all requests in Case Notes in TAS. The Case Note shall contain at a minimum the following information: type of services requested, how the service links to the Individual Service Plan or Work Activity, type of documentation in the file, name of Client service is for, cost of service, name of vendor and other types of resources attempted to use.

22. Youth Graduation

- a. SPIPA Workforce Development may pay for Cap/Gown and basic Announcements only.
- b. Cash incentives, class rings, senior pictures and anything else are not allowable.
- c. Case Manager shall clearly document all requests in Case Notes in TAS. The Case Note shall contain at a minimum the following information: type of services requested, how the service links to the Individual Service Plan or Work Activity, type of documentation in the file, name of Client service is for, cost of
- d. service, name of vendor and other types of resources attempted to use.

23. Housing Move-in Expense

Housing assistance shall be used only when assisting a Cash Assistance Client with a long-term housing solution. This is not to be used for short-term housing solutions

(i.e., Emergency Support Services). Allowable expenses as necessary for housing include: first month's rent, last month's rent, damage deposit, utility deposits, and application fees.

Requirements for Housing Expense

- a. Authorize exact amount.
- b. Only the Workforce Development family's portion may be paid if other non-family members will be in the home.
- c. Payments may be for; first and last month's rent, deposits (utility and damage), and application fees.
- d. Case Manager shall ensure W-9 is completed and received.
- e. Case Manager shall ensure Client can afford housing on an ongoing basis. Requests for housing with monthly payments that the client cannot fit in their monthly budget will not be approved.
- f. Copy of lease/intent to rent shall be provided by Client.
- g. Additional amounts may be approved on a case-by-case basis by the Program Manager.
- h. Case Manager shall clearly document request in Case Notes in TAS. The Case Note should contain at a minimum the following information: type of service requested, how the service links to the Individual Service Plan or Work Activity, details of documentation in the file, name of Client service is for, amount and other types of resources attempted to use.

24. Basic Medical & Dental

Basic medical and dental expenses may be provided when a Client's own medical insurance does not cover specific items (i.e., mental health therapy, vision exams, and prescription eye wear).

Requirements for Basic Medical & Dental

- a. Authorize optical expenses up to \$500 per person one time per year for basic hardware once all other resources have been exhausted. Additional items or upgrades may not be approved unless there is a documented medical necessity provided by the eye care provider.
- b. Authorize necessary dental procedures at actual cost.
- c. Authorize expenses for lice treatment at actual cost.
- d. Authorize all other medical expenses up to \$500 per person one time per year.
- e. Written quotes are required from vendors when applicable.
- f. Over-the-counter medicine must be specified on the request.
- g. All unapproved purchases must be paid back to the program.

- h. Clients shall provide denial documentation from DSHS Medical Assistance Program.
- i. Case Manager shall clearly document request in Case Notes in TAS. The Case Note should contain at a minimum the following information: type of service requested, how the service links to the Individual Service Plan or Work Activity, details of documentation in the file, name of Client service is for, amount and other types of resources attempted to use.

25. Long Term Contracts:

- a. Support Services that involve a long-term contract and not a month-to-month contract are not allowable. Examples could be: Long Term Tutoring Services that require a contract, because we may end up paying the costs long after they are no longer a client.
- b. The Program cannot enter into an agreement that places The Program as Primary Party in a long-term contract because if eligibility for Workforce Development is lost The Program shall be unable to pay for services for a non-Workforce Development Client.
- c. The rationale for excluding this type of long-term service includes not being able to ensure the Client maintains compliance or remains a Client throughout the entire contracted period.

26. Employment Retention Incentive

- a. Clients may receive a cash incentive for maintaining employment on a quarterly and semi-annual basis. The amounts they may receive are:
 - i. 3 months: \$100.00
 - ii. 6 months: \$200.00
 - iii. 9 months: \$300.00
 - iv. 12 months: \$400.00
 - v. 18 months: \$500.00
 - vi. 24 months: \$500.00
- b. To be eligible to receive this incentive, clients must:
 - i. Obtain employment as a result of accessing WFD Services and maintain employment through the date they are eligible for the incentive,
 - ii. Turn in one month's worth of their most recent pay stubs, and
 - iii. Provide their current employer, position, start date, and current wages.
- c. For Cash Assistance Clients, the Employment Retention Incentive can be accessed after their case closes and they are placed in Transitional Services.

B. Work Experience (WEX)

WEX is a short-term, full or part-time work assignment with an employer that allows the

participant an opportunity to practice their current job skills, learn new skills, create a current work history, and explore occupations.

1. WEX Eligibility

- a. Adults & youth meeting the eligible requirements below are eligible for work experience when funds are available.
- b. Eligible Adults must:
 - i. Have a current ISP;
 - ii. Have an active 477 case;
 - iii. Be in compliance with The Program;
 - iv. Be cleared by a background check;
 - v. Be able to successfully pass a drug screen; and
 - vi. Have their High School Diploma or GED or are enrolled in classes and working towards acquiring their High School Diploma or GED or are exempt from this criterion.
- c. Eligible Youth must:
 - i. Be part of a family with a 477 case;
 - ii. Be in compliance with the WFD Program;
 - iii. Be 14 – 21 years of age;
 - iv. Be currently enrolled in school and in compliance with attendance requirements if school-aged;
 - v. Successfully pass a drug screen to the satisfaction of host employer and Site Manager; and
 - vi. Be approved by their parent/guardian.

2. Implementing a WEX

- a. Workforce Development staff shall:
 - i. Work with Clients to identify a career path.
 - ii. Ensure clients have a childcare and transportation plan and assist when possible. The transportation and childcare plan shall be documented in TAS Case Notes.
 - iii. Set an informal interview once a host work experience site is identified.
- b. Upon identification of a placement, the WEX packet shall be completed.
 - i. Submit the WEX packet to the Compliance Analyst for review and approval by the Program Manager.
 - ii. Work Experience cannot begin until the packet has been approved. A WEX shall not be developed with an employer who has laid off staff.
- c. WEX Clients shall:

- i. Complete a job application and résumé to be provided to the host work experience site prior to the interview.
- ii. Complete WEX packet and all requirements prior to beginning Work Experience.

3. Duration of a WEX Placement

- a. WEX Clients may participate in a WEX up to 6 months in a fiscal year.
- b. The WEX shall terminate immediately if participant is no longer a Workforce Development Client.
- c. After successfully completing a WEX placement, the Client may continue with the host employer in Subsidized Employment placement.

How WEX Clients are Supported

- a. The Host work experience site is the place where the WEX Client develops work experience; all WEX Clients are considered volunteers and not paid employees.
- b. Clients shall receive participant support funding to support them during their SPIPA WEX placement.
 - i. Funding shall be based on current approved support funding matrix, **see Attached Matrix**
 - ii. Funding and hours will be tracked with a Participant Support Funding Worksheet, verified by the host Work Experience Site, signed by the Workforce Development staff providing supervision and client.
- c. The WEX participant support funding amounts shall count as earned income for the client.
- d. If a WEX client is not in compliance with The Program's standards the Work Experience may continue but the funding that would have been issued is forfeited during the noncompliance period, unless good cause is established. The WEX funding may restart once compliancy is reestablished.
- e. If a WEX Client is suspected to have misrepresented actual time at the Work Experience on the WEX Participant Support Funding Worksheet the following will occur:
 - i. An investigation shall be conducted by the Site Manager.
 - ii. If the investigation concludes that the time in the work experience has been misrepresented, the host employer and WEX Client shall correct the Participant Support Funding Worksheet.
 - iii. All amounts received that were from misrepresented hours shall be recouped per SPIPA recoupment policies.
 - iv. A verbal warning shall be given to the Client and host work experience site.
 - v. If future misrepresentation occurs, the Client shall be immediately terminated from the WEX without notice. The Client will not be eligible for another WEX or Subsidized Employment position for no less than one year. The case will be

referred for a fraud investigation.

- f. All WEX placements are contingent on availability of program funding.

4. Necessary WEX Documentation

Workforce Development staff shall maintain the following WEX Documentation:

- a. Client résumé for adult clients.
- b. Copy of the Application of the Host Work Experience Site.
- c. Drug screen and background check verification
- d. Signed Recommendation and Agreement for Work Experience by Case Manager, Site Manager and Program Manager (Prior to the start of WEX)
- e. WEX Participant Support Funding Worksheet Budget for the length of the WEX
- f. Copies of driver license, insurance, and registration for those who may be driving on the job.

5. Expectations for WEX Clients

Clients shall:

- a. Continue to remain in compliance with The Program policies and procedures to be eligible for a WEX position and receive participant support funding.
- b. WEX Clients must remain compliant with their 477 plan. If a Client is non-compliant or sanctioned, they may continue to volunteer, but will not be eligible for participant support funding for the duration of the sanction. When the sanctioned has ended, the participant support funding may continue for the remainder of the WEX period.
- c. Completed Participant Support Funding Worksheet to be signed by the Client and verified by the host work experience site.
- d. Participant Support Funding worksheets contain 2 full weeks, and are submitted after the last day of the 2-week period is complete, no later than the following Monday. Staff will process the Participant Support Funding payment by the following Wednesday if it is verified.
- e. Turn in the pay stubs from the Participant Support Funding to be added to the file as earned income.
- f. Maintain appropriate appearance and behave appropriately as the job requires.
- g. Immediately report problems that occur on the job to the designated Workforce Development staff.

6. Expectations of the Host Employers With a WEX

A WEX employer shall have the following responsibilities:

- a. Complete a WEX Agreement with the Workforce Development staff and Client.

- b. Meet with the designated Workforce Development staff and Client at least once per month to discuss work experience.
- c. Provide direct supervision and work experience as listed in the job agreement and in accordance with the Employer's personnel policies.
- d. Keep track of client's hours and verify the hours on the Participant Support Funding worksheet.
- e. Treat WEX Clients as they would an employee.
- f. Schedule work hours for the WEX Clients. If the WEX schedule changes, the designated Workforce Development staff must approve.

7. Site Visits

- a. Site visits are conducted to review placement progress, attendance, punctuality, needs, and other issues.
- b. The designated Workforce Development staff shall conduct site visits as follows:
 - i. Within the first week of a placement.
 - ii. No less than once a month.
 - iii. Shall include the employer, participant, and the Workforce Development staff.
 - iv. Shall use Site Visit Form.
 - v. Workforce Development staff and the employer shall sign the Site Visit Form.
 - vi. All site visits shall be thoroughly documented in TAS Case Notes.

8. Modifying or Terminating a WEX

- a. The Program, the client, or the host work experience site may choose to terminate a WEX position.
- b. Any party must notify all other parties involved if he/she chooses to terminate a WEX assignment prior to the end of the agreement.
- c. Any changes or modifications to the WEX shall be in writing and signed by all parties.
- d. If a Client is terminated from a WEX position because of poor work performance or behavior, the Client shall not be eligible for another WEX or Subsidized Employment for a minimum of six months. The Program Manager may authorize an exception this time limit.

C. Subsidized Employment

Subsidized Employment provides Clients with a training period to gain and/or improve the knowledge and skills necessary to perform work requirements. A Subsidized Employment may be available to Clients who are hired by an employer other than SPIPA. It may be full or part-time in the tribal, public, or private sector. The employer pays the Client's wages, and The Program subsidizes up to 100% of the gross wage.

1. Subsidized Employment Eligibility

- a. Adults & youth meeting the eligible requirements below are eligible for subsidized employment when funds are available.
- b. Eligible Adults are:
 - i. Those who have a current ISP;
 - ii. In compliance with The Program;
 - iii. Cleared by a background check;
 - iv. Able to successfully pass a drug screen; and
 - v. In possession of their High School Diploma or GED or are enrolled in classes and working towards acquiring their High School Diploma or GED or are exempt from this criterion.
- c. Eligible Youth are:
 - i. In compliance with The Program;
 - ii. 14 – 21 years of age;
 - iii. Currently enrolled in school and in compliance with attendance requirements;
 - iv. Able to successfully pass a drug screen; and
 - v. Approved by their parent/guardian.

2. Implementing a Subsidized Employment

- a. E&T Specialist or designated Workforce Development staff shall:
 - i. Work with Clients to identify a particular field for a Subsidized Employment placement.
 - ii. Not place Clients with an employer that has recently laid persons off from work.
 - iii. Complete a Subsidized Employment packet prior to subsidizing wages.
 - iv. Ensure clients have a childcare and transportation plan and assist when possible. Client plans for transportation and childcare are to be Case Noted in TAS.
 - v. Review Client Responsibilities with Client.
 - vi. Submit the Subsidized Employment packet to the Compliance Analyst for review and approval by the Program Manager.
 - vii. The Subsidized Employment cannot begin until the packet has been approved.
- b. Clients shall:
 - i. Complete a job application and résumé to be provided to the employer
 - ii. Complete Subsidized Employment Agreement for The Program prior to wages being subsidized.
 - iii. For each new Subsidized Employment, a participant will need to pass a pre-employment drug screening and background check to the satisfaction of the host

employer and Site Manager, if required.

3. Duration of Subsidized Employment

- a. Maximum length of employment is limited to six months in a 12-month period.
- b. The Subsidized Employment may continue as a Transitional Client if the Client's Subsidized Employment earnings are over the Income Eligibility Guidelines.
- c. The Subsidized Employment will terminate immediately if participant is no longer a Workforce Development Client or in Transition.

4. Subsidized Employment Payment

- a. The Client is the employee of the employer during a Subsidized Employment. The employer is not considered a host employer but assumes all responsibility for the employee.
- b. The Program and the employer shall develop a Subsidized Employment Agreement which requires the employer to provide occupational training in exchange for reimbursement.
- c. The Program shall reimburse the employer up to 100% of the Client's hourly wage. The hourly wage must be reasonable, and fall within the prevailing wage for similar occupations. The Program has the ability with this policy to do an incremental reduction of reimbursement such as 100% the first 2 months, then 75% for 2 months, and then 50% for the last 2 months.
- d. All Subsidized Employments are contingent on availability of program funding.
- e. Reimbursement to employer will be in accordance with SPIPA Financial policies and procedures.
- f. Fringe shall not be included in calculating the reimbursement, (life insurance, tuition assistance, childcare reimbursement, cafeteria subsidies, loans, employee discounts, and employee stock options). Overtime is not reimbursable under a Subsidized Employment. Both are the responsibility of the employer.
- g. Employer or Client shall provide the E&T Specialist or designated Workforce Development staff with copies of timesheets and pay stubs issued to Client for the month reporting. Pay stubs shall indicate fringe benefits paid to the Client.
- h. It is the responsibility of the E&T Specialist or designated Workforce Development staff to ensure that billing is completed and forward copies of timesheets and pay stubs to caseworker.
- i. The employer must bill The Program according to the agreement for reimbursement.

5. Required Documentation for Subsidized Employment

The E&T Specialist or designated staff shall maintain the Subsidized Employment Documentation:

- a. Subsidized Employment Agreement.
- b. Recommendation for Subsidized Employment hire shall be submitted to the Case

Manager, Site Manager and Program Manager (Prior to the start of Subsidized Employment).

- c. All personnel employment documentation required by the employer.
- d. Client Résumé.
- e. Verification of drug screen and background check if applicable.
- f. Subsidized Employment Budget for the expected length of the Subsidized Employment.
- g. Copies of driver license, insurance, and registration for those who may be driving on the job.

6. Program Expectations for Subsidized Employment Clients

Clients shall:

- a. Continue to remain in compliance of The Program policies and procedures to be eligible for a Subsidized Employment position. If a Client is sanctioned, the Subsidized Employment will terminate the following month.
- b. Submit copies of pay stubs to Case Manager.
- c. Continue to submit Work Participation Logs and MERs monthly.
- d. Immediately report problems that occur on the job to the E&T Specialist or designated Workforce Development staff.
- e. Maintain appearance and behave appropriately for the position.

7. Program Expectations for Subsidized Employment Employers

Employer shall:

- a. Complete a Subsidized Employment Agreement with a Workforce Development staff representative and Client.
- b. Meet monthly with a Workforce Development staff representative and participant to discuss job progress.
- c. Provide direct supervision and work experience as listed in the job agreement and in accordance with the Employer's personnel policies.
- d. Submit necessary reimbursement requests monthly to the Workforce Development staff Representative for the duration of the Subsidized Employment.
- e. Determine whether to hire the participant at the end of the Subsidized Employment.
- f. Maintain confidentiality of Clients' Workforce Development status.

8. Site Visits

- a. Site visits are conducted to review attendance, punctuality, needs, and other issues.
- b. The E&T Specialist or designated Workforce Development staff shall conduct site visits as follows:

- i. Within the first week of a placement.
 - ii. No less than once a month.
 - iii. Shall include the employer, participant and the E&T Specialist or designated Workforce Development staff.
 - iv. E&T Specialist or designated Workforce Development staff and the employer shall sign the Site Visit Form.
- c. All site visits shall be thoroughly documented by completing the Site Visit form and entering into TAS Case Notes.

9. Modifying or Terminating Subsidized Employment

- a. A client must be terminated from the Subsidized Employment position if the client is no longer eligible for Cash Assistance or Transitional Services.
- b. Subsidized Employment shall be "at will." SPIPA or the employer may choose to terminate the Subsidized Employment for no reason or any reason.
- c. The E&T Specialist or designated Workforce Development staff shall be notified if the Client or employer chooses to terminate a Subsidized Employment prior to the end of the agreement.
- d. Any changes or modifications to the Subsidized Employment shall be in writing and signed by all parties.
- e. If a Client is terminated from a Subsidized Employment position because of poor work performance or behavior, he/she shall not be eligible for another Subsidized Employment position for 6 months. Program Manager may authorize an exception to this time limit.

D. Youth Employment

1. Program Description

- a. The Youth Employment Program is for youth between the ages of 14 and 21 when program funds are available. The program provides subsidized employment for youth who are part of a Workforce Development Program and/or members of a SPIPA Workforce Development tribal community.
- b. Subsidized employment wages will be paid by the employer to the participant and reimbursed by the SPIPA Workforce Development Program, or WEX participants will receive a participant support funding based on the hours they volunteered at the host site.
- c. The subsidy rate for a Youth Employment Program may be paid up to 100%.
- d. A completed project proposal and youth employment packet is required prior to implementing a Youth Employment Program.

2. Process

- a. Youth Employment programs may be offered at the discretion of the Program Manager

as long as funds are available.

- b. Sites may determine whether a WEX or Subsidized Employment is best for their participants and choose which to use in a proposal.
- c. All projects and attendees shall be inputted into TAS.

The youth employment and volunteer program will require youth to attend several different trainings and workshops so that they are familiar with the tribal organization and that they get a better understanding of all the services that the tribe offers. These will include, but not be limited to:

- a. A Program Orientation
- b. A Tribal Organization Orientation **and**
- c. At least one of the following educational workshops or trainings:
 - i. Traditional and cultural education
 - ii. Financial Literacy
 - iii. Job Readiness and Employer Expectations
 - iv. Dangers and effects of alcohol and drug use and abuse
 - v. Importance of abstinence and teen pregnancy prevention
 - vi. Suicide Prevention
 - vii. Bullying Awareness and Prevention
 - viii. Healthy Relationships
 - ix. Professionalism in the workplace
 - x. Ethics
 - xi. Career Choices
 - xii. Higher Education

Work Experience

Any youth wishing to participate in the work and volunteer program must:

- 1. Complete a generic employment application
- 2. Interview for the job or volunteer position they applied for
- 3. After the youth is selected by the employer:
 - a. Will be required to pass pre-employment alcohol and drug testing prior to their first day of employment
- 4. The Program will utilize worksite agreements in which employers assure that there will be adequate supervision of each participant and accountability for participant's time and attendance. This agreement will be monitored for compliance by program staff.

Section 5 - Youth Services

One of the primary goals of the WFD Program is education. Without motivation and guidance to remain in school many of our youth drop out of the system. Youth services available under the Program may include, but are not limited to, the following:

- Educational Services
- Tutoring Services
- Summer Employment
- Work Experience
- School internships
- Vocational Exploration
- Cultural education
- Counseling referral

Section 6 - Emergency/Disaster/Public Health Crisis Response

An emergency/disaster/public health crisis can produce barriers to a Program client's efforts toward self-sufficiency, job training, skill development, educational activities, and economic development.

In the event an emergency/disaster/public health crisis does occur, the efforts to lessen stress on WFD clients may include, but are not limited to, temporary assistance with the following:

- Utilities bills
- Rental assistance
- Vehicle repairs
- Groceries
- Household supplies
- Financial and credit counseling

In the event of an emergency/disaster/public health crisis, limits to some support services may be temporarily waived by the WFD Program Manager.

Section 7 - Micro-Business, Economic Development, and Job Creation

Currently under development with each Tribe.

Section 8 – Uniform Grievance and Appeals Process

A. Uniform Grievance and Appeals Process

1. Workforce Development Cash Assistance recipients and applicants have the right to appeal any action that may affect their services as follows:
 - a. Denial of application for cash assistance,
 - b. Reduction of cash assistance,
 - c. Termination of cash assistance, and
 - d. Sanctions imposed upon cash assistance.
2. Workforce Development Cash Assistance recipients and applicants will be notified when any of these actions are taken. These notices will include instructions on the Workforce Development Uniform Grievance and Appeal process.
3. Workforce Development Uniform Grievance and Appeal process is as follows:
 - a. Workforce Development Cash Assistance recipients and applicants must send their appeal to the Workforce Development Program Manager within 15 days from the date of the notice of their denial, reduction, or termination of cash assistance.
 - b. Appeals must include the date, time, location, and statement of issues giving rise to

the appeal.

- c. A client may request to continue receiving other non-appeal related services until the final determination is made.
- d. The client will be notified in writing within 30 days of the date of appeal of the decision on the appeal.
- e. If the appeal review does not find in the favor of the client, they may request a second appeal with the SPIPA Executive Director for a final determination.
- f. The client will be notified in writing within 30 days of the date of the second appeal of the final determination.
- g. Workforce Development Program clients may have a spokesperson, advocate or attorney represent the client at his/her own expense throughout the appeal process. The client must sign a release of information for Workforce Development staff to discuss client's case with a spokesperson, advocate, or attorney.

Section 9 - Client and Program Standards

A. Client Rights and Responsibilities

1. Client's Rights

- a. To obtain services in accordance with The Program policy and procedure guidelines.
- b. To obtain copies of the following:
 - i. Application
 - ii. Release of Information
 - iii. ISP
 - iv. Other documents as approved
- c. To expect confidentiality and an explanation of its limitations, including disclosure to supervisors, partners addressed on the Release of Information, and/or treatment team professionals.
- d. To obtain information from their case records (excluding Case Notes)
- e. To actively participate in the development and implementation of Individual Service Plans.
- f. To refuse any recommended services and be advised of the consequences of such refusal.
- g. To be informed of all support services available through The Program.
- h. To receive equitable services.
- i. To exercise the appeal process as defined in the section entitled Uniform Grievance and Appeals Process.

2. Client's Responsibilities

- a. Notify the program of any change of address or circumstances within 10 days of the change. Such changes may include but are not limited to:
 - i. Other federal, state, or Tribal Assistance obtained
 - ii. Change of Address
 - iii. Leaving the Workforce Development Program
- b. To communicate with their Case Manager or WFD Staff at least once a month.
- c. To arrive prepared and on time for appointments with their Case Manager or WFD Staff.
- d. When a Client cannot keep their appointments, they must call their case manager or WFD Staff twenty-four hours prior to their scheduled appointment to reschedule.
- e. To submit all required paperwork to their case manager or WFD Staff including, but not limited to, the following:
 - i. Employment Verification
 - ii. School/Training Verification, financial aid, progress, and completion
 - iii. Other forms or documents as necessary to maintain eligibility or to determine support service assistance.
- f. Actively participate in development of the Individual Service Plan (ISP), any work activity, workshops, other activities as listed in the ISP.
- g. To fulfill all goals agreed to on their ISP unless good cause exists.
- h. To update their ISP every three months and report changes that may affect compliance with program requirements (meeting specific goals contained in ISP).
- i. Ensure attendance of required meetings, such as ISP reviews, workshops, and classes.
- j. Turn in all requested paperwork within 15 days of notification.
- k. Behave in an appropriate manner toward staff and other Clients and while at the Workforce Development site, communicating with Workforce Development Staff, or participating in any Workforce Development sponsored activities, refraining from physical or verbal harassment, or intimidation. Clients who exhibit such behavior may be required to attend counseling to address the behavior, and the ISP shall be revised to include those counseling activities. (The Client shall be asked to vacate the premises or if necessary, will be removed by local law enforcement officials. The case manager will complete an incident report when such incidents occur and future entrance to The Program's offices may be terminated.)
- l. Refrain from intoxication or the use of alcohol/drugs while meeting with Program staff, attending Workforce Development sponsored activities, or participating in work activities. (If this rule is violated, Client will be referred to drug and alcohol counseling and it will be added to the ISP.)
- m. To notify transportation specialists 24 hours before the scheduled time of pickup if a

ride is no longer needed.

3. Failure to Comply

Failure to comply with any of the above Responsibilities shall be sufficient cause to suspend or terminate services. Staff shall follow the failure to comply process for notification of noncompliance and its consequences.

- a. Prior to suspending or terminating services, a client shall receive a WFD Failure to Comply Warning Notice generated out of TAS. Copies shall be maintained in the physical file.
- b. Workforce Development staff shall mail Notice as soon as the failure to comply determination is made, giving client 30 days to comply or provide good cause prior to the suspension or termination of services are imposed for one or more of the following reasons:
 - i. Actively participate in ISP
 - ii. Regular communication with WFD Staff
 - iii. Submit Employment Verification
 - iv. School/Training Verification, financial aid, progress and completion or
 - v. Other forms or documents as necessary to maintain eligibility or to determine support service assistance.
- c. WFD Staff shall clearly document the failure to comply status in Case Notes in TAS. The Case Note shall contain, at a minimum, the following: the circumstances that created the need for suspension or termination, the length of the suspension or termination and any requirements needed to lift suspension or documentation needed to reapply for services due to termination.
 - i. Financial services shall be suspended from the day of the Failure to Comply Notice for up to 60 days and
 - ii. If client does not comply or show good cause within 60 days, the case shall be closed.

B. Program Responsibilities

1. Program staff will treat all Clients in a courteous, fair, and equitable manner.
2. Clients will be notified of any substantive changes to their services in writing.
 - a. ISP's are to be cooperatively developed taking into account the Clients' circumstances and contain realistic goals and time frames for completion. ISP reviews will be conducted every three months to ensure continued progress towards their ISP goals.
 - b. Workforce Development Staff will set all appointments with the client to determine progress and eligibility.
 - c. The Program shall ensure that all instructions, expectations, and available services are clearly communicated.
 - d. In some instances, referrals to professional mental health/substance abuse, vocational and educational evaluations shall be made to determine needs and potential barriers.
 - e. Staff shall notify clients within 24 hours, if possible, when an appointment needs to be rescheduled.
 - f. All Workforce Development Staff are mandatory reporters and are required to report suspected child maltreatment to an appropriate agency, such as child protective services, a law enforcement agency, or a State's toll-free child abuse reporting hotline.

Section 10 - Staff Standards

A. Staff Conduct

Professional conduct is at the core of The Program. The Program will articulate standards to guide staff conduct where the Client is the focus of services. The primary commitment of staff will be to provide equitable services and referrals to Clients in accordance with The Program policy and procedures.

1. General Conduct

- a. Staff will promote Client success.
- b. Staff will treat Clients equitably.
- c. Staff will demonstrate respect for cultural diversity.
- d. Staff will neither condone nor engage in discrimination based on age, color, culture, disability, gender, religion, sexual orientation, or marital or socioeconomic status.
- e. Staff will be respectful to each other.
- f. Staff will set aside personal agendas to work as a team.
- g. Staff will not let outside issues influence job performance.
- h. Staff will not engage in illegal activities.

2. Nonprofessional Relationships with Clients

- a. General
 - i. Staff will be aware of their influential positions with respect to Clients and will avoid exploiting the trust of Clients.
 - ii. Staff will avoid nonprofessional relationships with Clients that could impair professional judgment or increase the risk of harm to Clients.
- b. Specific Situation to be Avoided:
 - i. Sexual intimacies with Clients. Staff will not have any type of sexual intimacies with Clients and will not be the provider of services to Clients with whom they have had a sexual relationship.
 - ii. Staff should refrain from having close personal relationships with Clients.
 - iii. Staff shall notify their supervisors of a close relationship to a client that they might otherwise be assigned or provide services to.
 - iv. Staff will refrain from preferential treatment of Clients.
 - v. Staff should not accept personal gifts from Clients.
 - vi. Staff should not purchase items from their clients without supervisor approval.
 - vii. Staff will not exploit a Workforce Development Client for financial gain by borrowing or lending money.
 - viii. Staff will refrain from gambling activities with Client.
 - ix. Staff will not engage in alcohol/drug activities involving Clients.
- c. Actions to Take
 - i. Staff should notify their immediate supervisor if a nonprofessional relationship occurs with either a Client or volunteer. The supervisor will take appropriate action.
 - ii. When an ongoing nonprofessional relationship cannot be avoided staff will inform the immediate supervisor.

3. Conflict of Interest

- a. A staff member may not serve or oversee the services of an immediate family member.
- b. If the relationship cannot be avoided at that site, the Client's case must be transferred to another site.

B. Confidentiality

1. Workforce Development staff are responsible for ensuring that confidential information of Clients is not inappropriately released.
 - a. Staff should see that no names or identifying information of clients is in plain view or on their monitors when others may inappropriately view them.

- b. Any forms, referrals, or paperwork that contains client information should be sealed properly before it is sent to its destination.
 - c. Client files must not leave their designated site unless the case is transferring to another site.
2. Workforce Development may provide/obtain information to/from other agencies, employers, schools, or institutions with the intention of verifying and coordinating services. Case Managers should ensure proper release forms are on file.
3. Workforce Development staff shall consult with their direct supervisor to determine an exception.
4. Confidential information can be disclosed only under the specific criteria:
 - a. Tribal, Federal, or State-funded public assistance programs;
 - b. Tribal or State Child Support Enforcement programs;
 - c. Tribal, Local, State, or Federal law enforcement agencies only when requested;
 - d. Tribal, Local, State, or Federal Court ordered to release confidential information; or
 - e. To prevent clear and imminent danger to the Client or others.
5. Staff shall ensure that all electronic information that contains sensitive client information is secured and kept safely and privately.
 - a. Staff mobile devices that contain or can access client information should be secured with a password that is known only to appropriate staff.
 - b. Any portable drives with client information should be kept securely and/or encrypted.
 - c. If any data with sensitive client information is stored on an online drive, only appropriate Workforce Development staff should have access to that drive and those files.

C. Work Environment Confidentiality

1. Staff will ensure that work-related concerns are not shared with others in or outside of the agency (gossip, complaints, conflicts, etc.).
2. If staff believes an ethical violation has occurred or their rights have been violated, they should contact their supervisor, Human Resources staff, or Employees Assistance Program (EAP).
3. Staff shall refrain from talking about clients and sensitive information in public places, with non-staff persons, and with staff who are not involved in the case.

4. While working outside the office, staff shall refrain from displaying client information where it may be seen by non-staff persons, and from discussing client information where it may be heard by non-staff persons.

D. Mandatory Reporting

1. Staff shall follow applicable Tribal, state, and federal mandatory reporting laws with regard to child/vulnerable adult abuse, neglect, and/or exploitation.
2. Mandated reporters are persons or groups of persons who have frequent contact with children and families and are required to report suspected cases of child abuse and neglect to the appropriate social services or law enforcement agency.
3. When any staff member has reported an incident to the authorities, the staff member shall summarize the incident reported in an email or memo and send to the Site Manager.
4. All reports shall be forwarded to the Site Manager who shall maintain a confidential file of the incident.
5. For confidentiality purposes, these reports shall be Case Noted in TAS using Private Case Notes.

E. Physical Files

1. Staff will maintain records necessary for rendering professional services to the Clients and as required by laws, regulations, agencies, or institution procedures.
2. Staff will ensure working files are not in public view.
3. Staff will be responsible for securing the safety and confidentiality of any records they create, maintain or transfer whether the records are written, computerized, or stored in any other medium. If loss occurs notify immediate supervisor.
4. Staff will ensure that current and closed Client records are secured in locking cabinets apart from areas in which the general public may have access.
5. Physical Client files may not leave the Site unless preauthorized by the Site Manager.
6. Staff will file new documents immediately into physical file.

F. Changes to a Case

The Case Manager must accept and document each report of change, from any source, and examine the nature of the change to determine if action is required. When applicable, action should be taken within ten days of the receipt of the change.

1. It is the Case Managers responsibility to fully document in both the Case file and Case Notes of TAS all changes to the case.
2. When a Client verbally reports a change to the Case Manager, the Case Manager will inform the client of how their case is affected and case note the changes. If a child or adult is added to the household, a new application is required.

G. Change of Contact Information

Changes to a client's contact information must be made in TAS as soon as possible, as they affect every Workforce Development staff member's ability to reach the client. This includes a client's address, phone number, email, name, etc.

1. If the client communicates the change directly to the case manager, the case manager may enter the information and case note the change and method of communication in TAS.
2. If the client speaks to someone other than a case manager, the sites may choose the best method to transfer that information to the case manager in the most timely manner, which may include, but is not limited to:
 - a. Having the client fill out a MER reflecting the change(s). This will not count as their Monthly Eligibility Report if only the changing contact info is used and/or if it is not near the end of that month.
 - b. Staff may be able to make the changes in TAS themselves if the Site Manager allows. TAS will notify person who entered the CIF entry of all changes made to it.
 - c. Emails and memos of the change are also an acceptable method of communicating the change and may be used at the Site Manager's discretion.

H. Report of Change by an Outside Agency or Other Source

- 1. Changes reported by an outside agencies or other source should be confirmed** by contacting the Workforce Development household in order to substantiate the source's claim that a change has taken place. When an outside source reports a change to a SPIPA Workforce Development client and/or their household, Workforce Development staff must verify the information.
 - a. If the source is a trusted agency, such as State or Tribal Family Services, the information may be considered verified. The client must be notified of any action taken from the change reported.
 - b. If the source does not come from a trusted agency, the information must be verified through official documentation or by contacting the clients to have them confirm.
- 2. If the information is unverifiable** and/or if the client denies the change, Workforce Development staff must use reasonable methods to verify the claims. If no verification can be obtained, the benefit of the doubt will always go to the client's self-report.
- 3. Case Manager must document change reported in TAS, and action taken per policy.**

I. Case Notes

All interactions with a client must be case noted. This includes in person, phone calls, emails, and when documents are submitted.

1. General

- a. All Case Notes must be recorded in TAS.
- b. Case Notes should represent the Client situation – they recount the story, meaning the Client’s history, present circumstances, reflections, and actions.
- c. Document services provided and the interaction between the Client and the staff.
- d. Documents the justification of any action taken on a case.

2. Guidelines for Writing Case Notes

- a. When available, use Standard Content when entering case notes in TAS.
- b. Be thorough, note any significant aspect of appearance, expressions, behavior, responses, attitudes communicated, and level of participation. However, try to do so as directly and simply as possible.
- c. Write clear, objective description avoiding vagueness or generalities. When the Client’s own words work best, use them in quotation marks.
- d. For subjective information, such as appearance, enthusiasm, and demeanor, should be noted in an objective manner, and opinions should not be stated as facts. E.g., if a client appears under the influence and smells of alcohol,” we write that the client “appears under the influence and smells of alcohol,” and not that the client “came in drunk.”
- e. Write notes immediately, before you forget important information. If you must add something to the notes later, record it as a late entry and why that is the case.
- f. Consider how the Client is portrayed. Remember, Clients have legal access to their notes; keep in mind that they may read what you write. Think about how someone else would regard the Client and session from your notes and make sure that is accurate.
- g. Be careful with wording. Also keep in mind that other professionals or people outside your field may read these Case Notes. So be careful that how the Client comes across in your Case Notes is accurate and fair. Also, avoid field-specific jargon that could cause confusion.
- h. Case Notes are subject to subpoenas and may be used in legal proceedings. It is important to make sure that they are neat, accurate, and objective.

3. Case Note Formats

- a. TAS includes Standard Content for the most common Case Notes. Whenever possible, Standard Content templates should be used.
- b. Policy includes what must be in a case note for certain situations, such as Support Services, Sanctions, etc. TAS will already record the date and time of the case note as well as the person entering it and has many headers for what one is case noting, such as “Telephone Discussion” and “Client Services.” The following are ISP, Sanction Warning, and Client Services examples. These are not complete notes but give examples of format.
- c. The purpose of the case note should be stated first:

- i. “[Client’s name] came in for an ISP update...”
- ii. “Sent a sanction warning notice for [client’s name] not turning in their work activity logs which were due yesterday.”
- iii. “Entered an overpayment for \$250, starting next month.”
- d. Details of the note should follow and include anything policy requires:
 - i. “Set client goal for education to acquire AA degree from college, first step is to apply for FAFSA, and is due in 3 weeks...Work activities are 5 hours of volunteering weekly, 5 hours of cultural activities, up to 10 hours of Job Search...”
 - ii. “This will be [client’s name]’s first sanction unless good cause is provided. Their MERs were late last month as well, so the sanction will stand if they still turn in their logs late this time. They have until June 21 to provide good cause.”
 - iii. “Client misused PO to vendor that was intended for food and purchased an air fryer.”
- e. After all other information is provided, the action taken or plan of action should be stated last, if appropriate:
 - i. “Client will update FAFSA progress within 3 weeks from today, and the official ISP review date is September 19...”
 - ii. *No further action is necessary for the sanction example.*
 - iii. “Set 5 payments of \$50, starting in May. Client has been counseled on appropriate use of POs.”

J. General Case Management

This section of the Policy and Procedure manual does not supersede policy in the Program Standard section, but clearly outlines the expectations of the staff.

1. Meetings with Clients

- a. Clients are required to communicate with their Case Managers every month. Meeting must be thoroughly documented in TAS Case Notes.
- b. For the purposes of Cash Assistance - Child Only Cases are required to communicate with the Case Manager at least every six months.

2. Case Management Process

- a. Assessment of individual needs. Intake, Personal Assessment, and other assessments as needed.
- b. Development of Individual Service Plans.
- c. Facilitation, implementation, and coordination of services.
- d. Monitoring, evaluating services and outcomes, and reassessing.
- e. Documentation of case activity.

3. Personal Assessment

- a. Refer to Intake Standards – Assessments for more specifics
- b. The Workforce Development staff will complete Personal Assessment for each client. For the purposes of Cash Assistance, the Personal Assessment must be completed prior to the issuing of the second grant check; if Personal Assessment is not completed a case closure notice will be sent immediately.
- c. The Personal Assessment will be maintained in the physical file.
- d. It is **not** intended for the Client to complete the Personal Assessment themselves, but it is to be used as a dialogue or interview tool for the Workforce Development staff to complete.
- e. Information discovered while using the Personal Assessment will be used to create the ISP and Work Activities.
- f. The Workforce Development staff will thoroughly Case Note barriers and strengths identified while conducting the Personal Assessment in TAS.
- g. If a Client closes and reopens it may be necessary to complete a new Personal Assessment.

4. Individual Service Plan (ISP)

- a. Refer to Intake Standards – Individual Service Plan for more specifics.
- b. The ISP is individualized for each client receiving WFD Services to make progress toward self-sufficiency.
- c. It reflects the results of initial and any ongoing assessments of the Client's skills, prior experience, and characteristics affecting employability.
- d. The ISP is a collaboration effort between the Client and the Workforce Development staff to create a plan/guide to move a Client towards self-sufficiency.
- e. All clients receiving a WFD Services must cooperate and sign an Individual Service Plan (ISP). For the purposes of Cash Assistance, if a client is exempt or disregarded from work activities, they do not need an ISP, but cannot receive support services without an ISP with goals. This must be documented in TAS.
- f. The Workforce Development staff develops the ISP in consultation with the Client.
- g. The Workforce Development staff and Client should take into consideration, the realistic ability of the Client to complete the goals and steps identified on the ISP.
- h. All ISPs must have a clearly identified Employment and/or Career Goal.
- i. All ISPs must be signed by both Client and Workforce Development staff.
- j. At a minimum, the ISP should be reviewed with the Client every three months. For ISPs that have no changes upon reevaluation, the Workforce Development staff, and Client must sign and date, and Workforce Development Staff must update the plan in TAS using the Actual Review date and updating the Next Review Date.

- k. ISPs must be entered into TAS.

5. Support Services and Emergency Support Services

- a. Refer to Financial Services – Support Services or Cash Assistance – Client Services for more specifics.
- b. Case Managers will process request for Support Services and Emergency Support Services in a timely manner.
- c. All documentation must be attached prior to submitting to the Site Manager.
- d. Request must be thoroughly Case Noted in TAS.
- e. It may be necessary to assist the Client in obtaining documentation needed.
- f. It is strongly recommended you meet with the Client face to face in regards to the request.
- g. If Support Services or Emergency Support Services requests are incomplete, they will be returned to Case Manager. Case Manager will resolve immediately any missing documentation.

If Support Services or Emergency Support Services are denied the Case Manager will send denial letter and Case Note thoroughly. They will also zero out the Support Service/Emergency Support Services immediately in TAS.

6. Processing Notices

- a. Refer to Program Standards – Notices for more specifics.
- b. Most notices will be generated out of TAS.
- c. Workforce Development staff shall complete Notices when printed out of TAS by: checking off a box or filling in a blank with specific information relating to the Client(s). Workforce Development staff must thoroughly document in TAS/Case Notes the type of notice issued, details, and action.
- d. Notices not generated out of TAS shall have the following elements:
 - i. Reason for the letter.
 - ii. Action being taken and/or action being requested from Client(s).
 - iii. Policy that supports the action being taken.
- e. Workforce Development staff shall maintain a copy of letter in the physical file.

CASH ASSISTANCE

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B. Cash Assistance Matrix

CASH ASSISTANCE

Purpose of Cash Assistance

Public Law 104-193, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) authorizes Indian Tribes to manage, administer and operate Temporary Assistance for Needy Families (TANF) programs, formerly Aid to Families with Dependent Children (AFDC) within **the Four Purposes of TANF and WFD – Cash Assistance:**

1. To provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives;
2. To end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage;
3. To prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and
4. To encourage the formation and maintenance of two-parent families.

Progress will be monitored by ensuring that no less than 32% of families that are required to participate in work activities are participating in work activities that focus on Workforce Development.

1 – Intake Standards

A. Application Process

1. Right to Apply

Any person has the right to apply for Cash Assistance Services.

2. Initial Interview Requirement

- a. Whenever possible, the application process may include an onsite personal interview between a Program staff member and all eligible signer(s).
- b. The interview will include, but not be limited to:
 - i. Service orientation,
 - ii. Service requirements,
 - iii. [Work participation](#) requirements,
 - iv. School attendance requirements,
 - v. Income requirements, and
 - vi. Eligibility requirements.
- c. The interview must occur within ten business days of the cash assistance application date.
- d. In the case of a two-parent household, both parents must be present for an interview.

3. Disposition of Application

- a. A valid Workforce Development Application is required
If a Workforce Development case has been approved within one year of the Cash Assistance application, then a new Workforce Development application will not be required. Residency verification may be required if the Workforce Development application is more than 30 days old.
- b. Cash Assistance Application Valid 30 Days
A cash assistance application shall be considered current for 30 days from the date the application is signed; otherwise, a new application will be required in which case eligibility is based on the most recent application. The effective date of eligibility will be the date the application is considered complete with all required documentation to complete intake.
- c. Eligibility Decision
Once the cash assistance application has been received, and the intake staff has determined it to be complete, the Site Manager shall make an eligibility decision.
- d. Notice of Eligibility
Notices of Eligibility shall be mailed to the applicant no later than 10 business days after the completed cash assistance application is received with all required

documentation. The notice will state the amount of assistance for which the family is eligible and when it begins.

e. Notice of Denial

Notices of Denial shall be mailed to the applicant no later than 10 business days after the completed cash assistance application is received with all required documentation. The Notice of Denial will give the specific reason(s) for the denial and include information about the appeal process.

f. All notices must be generated out of TAS and Case Noted.

4. Documentation

a. The applicant has the primary responsibility for providing all documentation. Program staff may assist an applicant with gathering eligibility documentation when necessary.

b. If a physical copy of the required documentation is not available, proof that it was ordered will meet the documentation requirement.

c. If physical copy cannot be obtained, then other forms of verification may be approved by the [Program Manager](#).

d. Copies of all documents shall be maintained in the case file.

e. A family cannot be found eligible for Cash Assistance Services if the applicant refuses to allow the program staff to verify or document information relevant to the eligibility determination.

5. Eligibility Statement

a. An Eligibility Statement shall attest to the "General Factors of Eligibility" that have been established.

b. Signatures of both the staff member who conducted the intake, and the Site Manager is required on the Eligibility Statement.

c. The original Eligibility Statement shall be maintained in the [client](#) file and a copy shall be provided with the initial check request for Cash Assistance or Diversion Assistance.

6. Client Documentation

Intake staff may give copies of all cash assistance intake documents to the client.

B. Application

1. Filling out the Application

a. An applicant may obtain a cash assistance application at any SPIPA Workforce Development office, call an office to request an emailed or mailed application, or may fill out an application over the phone during normal business hours. Client may sign application upon first office visit.

- b. The Cash Assistance Application standards will be the same as the main Workforce Development Application.
- c. The applicant shall attest to whether the family has previously received cash assistance from another state/tribe. The applicant is required to attest to whether the family is currently disqualified from participating in any other tribal/state or federal program.
- d. No services shall be given until all eligibility criteria have been established and an interview has been conducted.

2. Required Signatures on the Application are:

- a. The single parent of the minor child, both parents in a two-parent family, and caretaker relatives of dependent children or the authorized representative of a caretaker relative;
- b. The supervising adult who resides with an un-emancipated minor head-of- household (when applicable); and
- c. The staff member(s) who conducted the interview.
- d. Signatures from applicants may be obtained electronically or over the phone with staff verification.

3. When is a Cash Assistance Application and Eligibility Documentation Required to Be Completed?

- a. Any time a client applies for Cash Assistance, including when transferring between sites;
- b. When a client reapplies from a closed, denied, withdrawn, or terminated status, unless the case closure was caused by administrative error;
- c. When the HH changes on any type of case;
- d. When any adult is added to an existing open case, a full cash assistance application form with eligibility documentation for that adult is required; and
- e. When any child is added to an existing open case a full application form with eligibility documentation for that child is required.
- f. An updated Workforce Development Application must also be completed for any new household member.

4. When is a New Cash Assistance Application NOT Required?

- a. To reinstate a closure attributed solely to an administrative error;
- b. When there is an address change but no change in site, (eligibility documentation is still required); and
- c. When there is a client name change but no change in household members. Legal name change documentation is required.
- d. When the case becomes a New Child Only (adults removed due to Social Security

income).

- e. When an adult who is not the HH or a child is removed from the grant.

C. General Eligibility for Cash Assistance

To be eligible to receive services under the Program:

1. A family must include:

- a. A dependent child under age 18; or
- b. A dependent child who is 18 years of age and is a full-time student in a secondary school (or in the equivalent level of vocational or technical training) at time of application; or
- c. A pregnant woman as documented by a physician with no other dependent children in the home; and

2. The family on the grant must include at least one member of a federally recognized Indian Tribe as defined in the Service Population Section.

3. Eligibility for an unmarried parent under the age of 18 is limited to an individual who meets the following criteria:

- a. Is living in an adult supervised setting and:
 - i. Has a child in his or her care; and/or
 - ii. The pregnancy is certified by a physician; and
- b. Has completed or is actively working towards completing high school or its equivalent.

D. General Eligibility Factors for Cash Assistance

All factors of eligibility shall be met and documented.

1. Family Unit – A family Assistance Unit ([AU](#)) must include a dependent child or a single pregnant woman as documented by a physician.

2. At least one individual in the AU must be a member of a federally recognized tribe

3. No individuals in the AU may be members of any excluded Tribes

- a. Adults or children who are members of an excluded Tribe may be excluded from the AU and the grant for the rest of the family to be eligible.
- b. The remaining AU members must meet all other eligibility criteria.

4. Members of the AU for each case type are as follows:

- a. Single/Two-Parent Family – The adult(s) and the child(ren) receiving the monthly grant.
- b. Child Only Grant – The adult caregiver(s) and the child(ren).
- c. In Child Only Grants that exclude the parent because of social security income or

sanction, only the children shall be considered members of the AU.

- d. Pregnancy Grants – The single pregnant woman who has no other dependent children of her own in the home as documented by a physician.

5. Residency – Proof of residency in the Cash Assistance service area includes a reasonably current:

- a. Rent or lease agreement;
- b. Statement from landlord;
- c. ACES verification from state;
- d. Mortgage papers;
- e. Utility company record or bill addressed to the primary applicant at current address;
- f. Letter from education or local, state, tribal, or governmental agency addressed to the primary applicant at current address; or
- g. A signed residency statement may be accepted when homeless, with verification from an adult with whom client is residing, or when any of the other items cannot be obtained.
- h. A PO Box is not acceptable in any circumstance.

6. US Citizen or Qualified Alien Status

- a. An applicant must be a United States citizen or certified legal alien resident.
- b. An applicant and all members of the household may provide an original social security card or verification of Social Security Number with the State, Tribal program, or Social Security Administration.
- c. Birth Certificates for all members of the household must also accompany the application. If there is no Birth Certificate available, one may be ordered and paid for by SPIPA. If one is ordered, it must be mailed to SPIPA's offices when possible, and received within 90 days. Proof of the order will be kept with the application.
- d. If Birth Certificates cannot be obtained, documents in the table on the following pages under US Citizen or Qualified Alien may be used. Intake staff must Case Note the reason a Birth Certificate cannot be obtained and what was used in its stead.

7. School Enrollment

- a. A dependent child age 6 or older must be enrolled in school.
- b. School Enrollment and Attendance Form completed for each school age child.
- c. Children who are 18 years of age must be a full-time student in a secondary school or in the equivalent level of vocational or technical training.
- d. Children age 18 who have obtained their High School Diploma, or its equivalent are not eligible.
- e. Children under 18 who have obtained their High School Diploma, or its equivalent

may be eligible until they are 18 years of age.

- f. Client file must include current school year documentation for each child.
- g. When school is not in session, eligibility will be granted until school resumes and enrollment can be provided.

8. Child Only

- a. The applicant must provide:
 - i. Valid court order regarding placement; or
 - ii. Voluntary placement plans or agreements signed by the parent and an authorized representative of the child placing agency; or
 - iii. State or Tribal written verification by an authorized representative documenting current placement of the child(ren); or
 - iv. Valid Power of Attorney authorizing placement of a child(ren) signed by the [custodial parent](#).

9. Minor Parent

- a. Minor Parent must have a documented adult-supervised living arrangement, documented in TAS Case Notes. The adult-supervised setting may be waived if:
 - i. the individual has no parent, legal guardian, or other appropriate adult relative of his or her own who is living or whose whereabouts are known;
 - ii. no living parent, legal guardian, or other appropriate adult relative, who would otherwise meet applicable State criteria to act as the individual's legal guardian, of such individual allows the individual to live in the home of such parent, guardian, or relative;
 - iii. the State agency determines that—
 - 1) the individual or the minor child is being or has been subjected to serious physical or emotional harm, sexual abuse, or exploitation in the residence of the individual's own parent or legal guardian; or
 - 2) substantial evidence exists of an act or failure to act that presents an imminent or serious harm if the individual and the minor child lived in the same residence with the individual's own parent or legal guardian; or
 - iv. the Program otherwise determines that it is in the best interest of the minor child to waive the requirement with respect to the individual or the minor child.
- b. Minor Parent must be a full-time student in or have completed a secondary school or the equivalent level of vocational or technical training.
- c. According to Title IX of the Education Amendments of 1972: "*No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or*

activity receiving Federal financial assistance.”Therefore, “a school must excuse a student’s absences because of pregnancy or childbirth for as long as the student’s doctor deems the absences medically necessary” and will be deemed in compliance with Workforce Development program requirements.

10. Completed and Signed Cash Assistance Application

11. Income

- a. Applicant may not exceed the income guidelines outlined in the Cash Assistance Matrix.
- b. Applicant must document all applicable earned & unearned income with the following:
 - i. Pay Stubs;
 - ii. Verified statement from employer which includes name of employer and wages for the past month.
 - iii. Verified statement of direct child support from non-custodial or custodial parent;
 - iv. Bank statements of income;
 - v. Statement of benefits (L&I, UC, [SSI](#), etc.); and/or
 - vi. Per Capita statement.

12. Tribal Affiliation

- a. Verification of enrollment in a federally recognized tribe.
- b. Applicants must not be a member of an excluded Tribe unless that [child](#) or adult is excluded from the grant. If an adult is excluded from the grant for being enrolled in an excluded Tribe, all countable income of the excluded individuals will be used to determine eligibility, grant amount, and support services.

13. Resources

Family resources in excess of \$5,000 will disqualify the family from Cash Assistance Services.

14. Prior State or Tribal TANF/Cash Assistance Months

- a. Applicants cannot have reached the sixty-month time limit for cash assistance/TANF. Exceptions cannot be granted to applicants who have reached the time limit.
- b. [TIC](#) Screens shall be acquired by the intake staff.
- c. Prior months from other Tribal TANF/Cash Assistance programs must be requested and obtained by the SPIPA Workforce Development staff. If an applicant lived in an area where a Tribal TANF/Cash Assistance program operates, the SPIPA WFD staff must verify if and what months the client has

received benefits.

- d. If there is a discrepancy in the months an applicant or client has in TAS and what is acquired from State and Tribal TANF/Cash Assistance programs, the months need to be corrected in the database by a member of the SPIPA Workforce Development staff.

15. Child Support

The Child Support Assignment and Referral must be completed, signed, and sent to the SPIPA Child Support Specialist and the DCS Office, unless both parents of all children are in the [AU](#) or Good Cause is granted by Site Manager.

E. Definition of a Family

As per Federal Regulation § 286.20 "A Tribe must indicate its definition of 'Indian family' in its Tribal Family Assistance Plan." Further § 286.20 states this definition is used to determine the transfer of funds from the Federal / State Government for the Workforce Development Program – Cash Assistance Service. The definition of the family is considered the definition of the Assistant Unit.

The definition of "family" for the purpose of Cash Assistance means persons living together in a household including: all-natural children, stepchildren, adopted children, relative child, or non-related children (including non-Indians) under the age of 19 living with an eligible adult.

F. Definitions of Types of Families

1. Single Parent Family

- a. An adult with at least one minor child residing together. Adult may be a natural, adoptive, stepparent, or guardian of a minor child that meet all other eligibility standards, including income, may be considered as a one-parent family;
- b. A pregnant woman as documented by a physician, regardless of marital status, who is an enrolled member of a federally recognized tribe, with no other dependent children in the home;
- c. Two adults regardless of their marital status with at least one minor child in the AU with one adult receiving SSI. Adults may be a natural, adoptive, stepparent, or guardians of a minor child in the family that meet all other eligibility standards including income. At least one person remaining on the grant must be enrolled in a federally recognized tribe; or
- d. Single minor parent with at least one minor child residing together in an adult supervised home, and that meet all other eligibility standards, including income, are considered a one-parent family.

2. Two-Parent Family

- a. Two adults with at least one minor child in common residing together regardless of their marital status. The adults may be natural, adoptive, or stepparents of a minor

child in the family. All adults will engage in work participation unless an [exemption](#) exists or good cause is demonstrated;

- b. Two adults with at least one minor child, but no children in common, residing together, regardless of the marital status. Adults may be natural, adoptive, stepparent, or guardians of a minor child in the family that meet all eligibility standards including income may be considered a two-parent family. If two adults are receiving other federal, state, or tribal assistance as a two-parent family (such as food benefits), or if there is a pregnancy involving both adults and other children are in the home, then they must be considered a two-parent family with SPIPA. All adults will do work participation unless exemption or good cause exists:
 - i. If it is discovered that an adult who is not on the grant is receiving other federal, state, or tribal assistance with the head of household as a two-parent family, the family must be given a sanction warning and have 15 days to add the other adult,
 - ii. If the adult is not added within 15 days, the sanction will apply, and they will be given 30 days to add the other adult or the case will close; or
- c. Minor parents, regardless of marital status, with a child in common residing together in an adult supervised home. All minor parents will do work participation.

3. Child Only

- a. Children who are in the care of a relative, legal guardian, or custodian;
- b. Adult parent with at least one minor child residing together in which the adult receives SSI. Parent may be a natural, adoptive, or stepparent of a minor child in the family. A parent or any of the children in the household may be enrolled in a federally recognized tribe to satisfy the requirement of at least one member of a federally recognized tribe; or
- c. Safety Net, when an adult parent with at least one minor child residing together in which the adults have been sanctioned off the grant. A parent or any of the children in the household may be enrolled in a federally recognized tribe to satisfy the requirement of at least one member of a federally recognized tribe.

G. Acceptable Documentation for Cash Assistance Eligibility

Item to Verify:

Minimal Acceptable Verification:

<p>Identity</p> <p>(A Photo ID, verification of SSN with the State, Tribal program, or Social Security Administration, and birth certificates for adults on the grant)</p>	<p>Required for <u>all on the Grant</u>:</p> <ul style="list-style-type: none"> • SS Number • Birth Certificate within 90 days, if possible, to obtain <p>Current Photo ID (1 of the following required for all adult applicants)</p> <ul style="list-style-type: none"> • Driver License • State or Tribal photo ID • Passport • DOC ID • Active Military ID
<p>Residency</p> <p>(one from list)</p>	<ul style="list-style-type: none"> • Rental or Lease Agreement or receipt • Statement from Landlord • State Verification (Address Register [ADDR] Screen) • Mortgage papers • Utility company /Government agency/Educational Organization records or bills with printed address for primary applicant • Letter from education, local, state, tribal, or governmental agency (not from a SPIPA program) • Residency statement (if the above cannot be obtained)
<p>US Citizen or Qualified Alien</p>	<p>One of the following documents:</p> <ul style="list-style-type: none"> • Birth Certificate within 90 days, if possible, to obtain • Naturalization Papers • Passport • Tribal ID
<p>Child's Age</p> <p>(one from list)</p>	<ul style="list-style-type: none"> • Birth Certificate within 90 days • Tribal Identification • Newborns only – child less than three months of age – statement of birth from hospital or doctor. Staff must obtain birth certificate within 90 days of adding child to grant or case will be closed.
<p>Child Enrolled in School</p> <p>(one from list)</p>	<ul style="list-style-type: none"> • School Participation Form • Current school records • Vocational School records (registration or class record) • Enrollment Verification Statement from school • Application or proof of application do <u>not</u> qualify

<p>Child in Caretaker Home</p> <p>(Only for Child Only) (one from list)</p>	<ul style="list-style-type: none"> • Valid Court Order regarding placement • Voluntary placement plans or agreements signed by the parent and an authorized representative of the child placing agency • State or Tribal written verification by an authorized representative documenting current placement of the child(ren) • Legal Power of Attorney authorizing placement of a child(ren) signed by the custodial parent or both parents.
<p>Minor Head of Household School Requirement</p>	<ul style="list-style-type: none"> • School Participation Form • Current school records • Vocational School records (registration or class record) • Enrollment Verification Statement from school • Application or proof of application do <u>not</u> qualify • High School Diploma or its equivalent
<p>Minor Head of Household Adult Supervised Living Arrangement</p>	<ul style="list-style-type: none"> • School records with Minor Parent's name and address as well as supervising adult's • Documented in TAS description of Adult Supervised Living Arrangement • Documentation of waiver
<p>Cash Assistance Application Completed & Signed</p>	<p>Verify application signatures & initials:</p> <ul style="list-style-type: none"> • Client, Spouse or other adult (if applicable) <ul style="list-style-type: none"> ○ May be signed in person, verified by email or by Workforce Development staff over the phone. • Workforce Development staff
<p>Income</p> <p>(all of the following if applicable)</p>	<ul style="list-style-type: none"> • Pay Stubs • Written Employer statement • Statement of Government/Insurance benefits (examples: L&I, UI, SSI) • Verified Per Capita statement from client or tribe
<p>Tribal Enrollment</p>	<ul style="list-style-type: none"> • Tribal Enrollment card • Written verification from Federally Recognized Tribe • CIBs that include enrollment in tribe (enrollment in a corporation is not considered enrollment in a tribe)
<p>Resources</p>	<ul style="list-style-type: none"> • For vehicles, Kelley Blue Book or other Fair Market Value agency • For bank accounts, bank statements • Deed, title, or tax assessment for property
<p>Prior Tribal/State Assistance</p>	<ul style="list-style-type: none"> • DSHS TIC Screen for any adult on the grant • Written statement from State TANF Program or Tribal TANF for prior Cash Assistance/TANF months

Non duplication Cross Check	<ul style="list-style-type: none"> • ACES information for any adult and child on the grant. • Cross check includes, but not limited to: demographics, social security, non-duplication of services, resources, income, family composition
Child Support	<ul style="list-style-type: none"> • Child Support Assignment and Referral or Documentation of Good Cause • Verification of direct payments, if applicable <ul style="list-style-type: none"> ○ Bank statements ○ Agreements

H. Service Area – Residency Requirement

The Workforce Development Program - Cash Assistance service area and population is as follows:

Nisqually Indian Tribe

The service area is defined as the Nisqually reservation and the counties of Thurston and Pierce within the State of Washington. This service area is defined in the Federal Register as the official and approved service area for the Nisqually Indian Tribe.

The service population is defined as:

1. All enrolled Nisqually Tribal members and verified descendants of tribal members as elected and defined by the tribe living on the Nisqually Reservation.
2. All enrolled Nisqually tribal members and verified descendants of tribal members as elected and defined by the tribe living in the near reservation service area.
3. All enrolled American Indians from federally recognized tribes and Alaska Natives, residing on the Nisqually Reservation.
4. All enrolled American Indians from federally recognized tribes and Alaska
5. Natives, residing in the near reservation service area excluding:
 - a. In Thurston County, members of the Confederated Tribes of the Chehalis Reservation, Puyallup Tribe and Suquamish Tribe.
 - b. In Pierce County, members of the Puyallup Tribe, Muckleshoot Tribe, and Suquamish Tribe.

Shoalwater Bay Tribe

The service area is defined as the Shoalwater Bay Reservation and Pacific and Wahkiakum Counties within the State of Washington. This service area is defined in the Federal Register as the official and approved service area for the Shoalwater Bay Indian Tribe.

The service population is defined as:

1. All enrolled Shoalwater Bay tribal members and verified descendants of tribal members as elected and defined by the tribe living on the Shoalwater Bay Reservation.

2. All enrolled Shoalwater Bay tribal members and verified descendants of tribal members as elected and defined by the tribe living in the near reservation service area.
3. All enrolled American Indians and Alaska Natives, from federally recognized Tribes, residing on the Shoalwater Bay reservation.
4. All enrolled American Indians and Alaska Natives, from federally recognized Tribes, residing in the near reservation service area.

Skokomish Tribal Nation

The service area is defined as the Skokomish reservation and Mason County within the State of Washington. This service area is defined in the Federal Register as the official and approved service area for the Skokomish Tribal Nation.

The service population is defined as:

1. All enrolled Skokomish tribal members and verified descendants of tribal members as elected and defined by the tribe living on the Skokomish Reservation.
2. All enrolled Skokomish tribal members and verified descendants of tribal members as elected and defined by the tribe living in the near reservation service area.
3. All enrolled American Indians from federally recognized tribes and Alaska Natives, residing on the Skokomish reservation.
4. All enrolled American Indians from federally recognized tribes and Alaska Natives, residing in the near reservation service area excluding:
 - a. In Mason County, members of the Confederated Tribes of Chehalis Reservation and Suquamish Tribe.

Squaxin Island Tribe

The service area is defined as the Squaxin Island reservation and the counties of Mason, Kitsap, Pierce and Thurston within the State of Washington. This service area is defined in the Federal Register as the official and approved service area for the Squaxin Island Tribe.

The population is defined as:

1. All enrolled Squaxin Island tribal members and verified descendants of tribal members as elected and defined by the tribe living on the Squaxin Island Reservation.
2. All enrolled Squaxin Island tribal members and verified descendants of tribal members as elected and defined by the tribe living in the near reservation service area.
3. All enrolled American Indians from federally recognized tribes and Alaska Natives, residing on the Squaxin Island reservation.
4. All enrolled American Indians from federally recognized tribes and Alaska Natives, residing in the near reservation service area excluding:
 - a. In Mason County, members of the Confederated Tribes of Chehalis Reservation and Suquamish Tribe.

- b. In Kitsap County, members of the Port Gamble S’Klallam Tribe, Suquamish Tribe and Puyallup Tribe.
- c. In Thurston County, members of the Confederated Tribes of Chehalis Reservation, Puyallup Tribe and Suquamish Tribe.
- d. In Pierce County, members of the Puyallup Tribe, Muckleshoot Tribe, and Suquamish Tribe.

Puyallup Tribe of Indians

The service area is defined in the Federal Register as the official and approved service area for Puyallup Tribe of Indians is the Puyallup reservation and the counties of Pierce, Thurston and King within the State of Washington. For the purpose of this Plan the service area will include only Pierce County on the Puyallup Reservation.

The service population is defined as:

- 1. All enrolled Puyallup tribal members living on the Puyallup Reservation.
- 2. All enrolled American Indians and Alaska Natives, from federally recognized tribes, residing on the Puyallup reservation.

Expanded Service Area

The service area is defined as all off-reservation areas in the counties that border the current service area to include Grays Harbor, Jefferson, Lewis, and King counties. Any family that is eligible for services provided by another Tribal TANF/Cash Assistance program in the expanded service area will not be eligible for services by SPIPA.

The service population is defined as:

- 1. All enrolled Nisqually, Squaxin Island, Skokomish, and Shoalwater Bay tribal members living in the expanded service area excluding:
 - a. In Grays Harbor County, members of the Quinault Tribe, Cowlitz Tribe, and Confederated Tribes of the Chehalis Reservation.
 - b. In Jefferson County, members of the Quinault Tribe, Suquamish Tribe, Port Gamble S’Klallam Tribe, and Confederated Tribes of the Chehalis Reservation.
 - c. In Lewis County, members of the Quinault Tribe, Cowlitz Tribe, and Confederated Tribes of the Chehalis Reservation.
 - d. In King County, members of the Puyallup Tribe of Indians, Muckleshoot Indian Tribe, and Suquamish Tribe.

All Locations

The Program may not serve anyone residing on a tribal reservation unless there is a written agreement between the tribe and SPIPA indicating that the Program may serve such individuals.

I. Income as it Relates to Eligibility

This section is for income as related to eligibility and diversion cases at intake. For current clients see Income Considerations for Current Clients section in Program Standards.

1. Income

- a. All income earned and unearned, countable and not countable is reported as monthly income.
- b. Earned income is the receipt of wages, salary, commissions, or profits from activities earned as an employee or through self-employment. All other income is considered unearned, unless stated otherwise.
- c. Total gross monthly income: all countable income is counted at the gross amount, before deductions.

2. Availability of Income

- a. Monthly Income
 - i. All incomes of the applying household must be considered, which would include all earned and unearned income.
 - ii. Income is counted the month it becomes available to the client to spend.
- b. Countable Income Sources
 - i. Earned and/or Unearned as received by an adult member of a household as defined in "Definition of Types of Family" in Intake Standards of this Section.
 - ii. Unearned Income as received by a child member of a household as defined in "Definition of Types of Family" in Intake Standards of this Section.
 - iii. Income of the supervising adult in a Minor Head-of-Household is not considered available.

3. Verification of Income

- a. All income which is determined to be available to any member of the Workforce Development AU must be verified.
- b. Verification must be documented and placed in the case file and TAS.
- c. Documentation shall include, but not be limited to:
 - i. Pay stubs.
 - ii. Written employer statement.
 - iii. Statement of government benefits, such as SSI, UC, L&I, etc..
 - iv. Per Capita statement.
 - v. Child Support Income statement.

4. Types of Income

- a. All income is separated into 2 types: earned and unearned.

- b. Earned Income – Any legal income that is taxable under the US Tax Code and specific Tribal Tax Codes (work incentive deductions apply)
 - i. Wages from adults for regular employment, self-employment – Examples of self-employment include fishing, digging, diving, etc. in these cases the expenses associated with earning the income would be deducted (ex: gas, permit and repairs to the boat for fishing)
 - ii. Earned Income from Work Experience programs (including, but not limited to: **VR**, Cash Assistance/TANF, **WIOA**)
 - iii. Stipends for clients (adult/youth) can be considered earned income, as long as there is documentation that the stipend is received in exchange for a service.
 - iv. Count payments to people administering AmeriCorps VISTA who are civil service employees as earned income.
- c. Unearned Income – counted dollar for dollar against the grant and applies to both Adults and Youth unless stated otherwise.
 - i. Retirement
 - ii. Social Security Benefits
 - iii. Veteran’s Pension
 - iv. Dividends and Interest
 - v. Unemployment Compensation
 - vi. Direct Child Support – child support received directly minus the pass through. See Child Support Section for specific guidance in Program Standards.
 - vii. Royalties
 - viii. Time-loss compensation – if received using time off due to accident or injury
 - ix. Contest, lottery, gaming winnings
 - x. Per Capita Payments based on gaming (Up to \$5,000 Per Capita Spend down may apply – see Program Standards for calculation process)
 - xi. Alaskan Permanent Funds
 - xii. Payments from any type of cash assistance program that, as described in the Tribal General Welfare Exclusion Act:
 - 1) Are for the promotion of general welfare
 - 2) Have specific guidelines as to who can receive them
 - 3) Are not lavish or extravagant
 - 4) Are not a compensation for services
 - xiii. Deposits into joint accounts owned by a Workforce Development cash assistance applicant or recipient adult or child that are not for Protective Payee services to another individual

- xiv. Direct cash gifts by someone who is not in the AU.
- xv. Any VA payment not for vocation rehabilitation.

5. Exempt Income

- a. WIOA Payments – unearned WIOA payments include: training stipends and earned income from participation in Summer Youth Employment.
- b. Per Capita payments NOT based on gaming. See per capita section in Program Standards for more details.
- c. Earned income of a dependent child.
- d. Child Support Pass Through from the Program – the Program allows \$150 per child passed through to an active Cash Assistance household. (See Child Support Program Standards for more details.)
- e. Education Assistance – Grants, scholarships or awards under Title IV of the Higher Education Act of 1965 or under a Bureau of Indian Affairs student assistance program.
- f. Work Study Earned Income – Any income earned from employment in a work study program via a college.
- g. Earned Income Tax Credit – Any EITC payment made to an applicant or recipient of cash assistance is disregarded as income.
- h. Energy Assistance Payments – Payments by LIHEAP and/or Energy Assistance Programs, including annual direct cash payments to Workforce Development Cash Assistance Recipients.
- i. U.S. Department of Veterans Affairs or Division of Vocational Rehabilitation – Considered complimentary program benefits. VA educational assistance is treated as educational income and certain educational costs may be allowed as deductions.
- j. Earnings from US Census employment.
- k. Judgment/payments distributed to Indian Tribes up to \$2,000.00 per person per payment (P.L. 98-64)
- l. Income received by Indians from Interest held in trust – up to \$2,000.00 per year (P.L. 103-66)
- m. The Food Stamp Act Allotment or USDA Commodity Program Services
- n. American Red Cross or Federal State or County Disaster Relief Funds
- o. Low Income Heating and Energy Assistance Payments (P.L. 98-558)
- p. Any Income from Alaskan Claims up to \$2,000 (P.L. 100-241).
- q. Federal Financial Aid and Grants (PELL)
- r. Non-taxable income derived from treaty rights such as commercial fishing, clam digging, and guiding. The adult or minor parent must be eligible to participate in the

treaty activity to disregard the income. Income needs to be reported each month.

- s. Exclude payments from all AmeriCorps (not VISTA) programs (salary, wages, stipends or reimbursements, in-kind, etc.) as income.

6. Special Circumstances to Consider with Households and Income

a. Foster Care

- i. A child cannot be included in a Cash Assistance unit and be receiving Title IV-E Foster Care or State/Tribe/Private Agency-funded foster care benefits for the same period. For example, in a situation where a single parent has two children and also cares for a foster care child, the foster care child would not be considered part of the AU and the household size for determining payment would be 3.
- ii. Any foster care or adult foster care payment made by CPS/ICW or the State/Tribe/Private Agency to a Workforce Development – Cash Assistance parent or caretaker in order to care for a foster child or foster adult who is not receiving cash assistance benefits will not be counted as income in determining eligibility or payment amounts.

b. Payments to Native Americans (Per Capita payments)

- i. Per Capita payments are funds that are distributed to tribal members by the Secretary of the Interior or an individual tribe.
- ii. Per Capita is excluded as resources or unearned income if the per capita payment is not based on gaming.
- iii. The source of the per capita payment should be verified by the Workforce Development staff with the individual Tribe or BIA to make the determination how the funds will be counted.
- iv. Per Capita is countable as unearned income if the money is taxable under the United States Tax Codes.
- v. Per capita is considered unearned income in the month received and a countable resource in following months.
- vi. In the case of a child's portion, if the money is held in trust for that child until they reach a specific age, the money would not be considered as income or resources for that child/family. Monies no longer held in trust are countable.
- vii. Per capita payments that are not excluded are subject to a Per Capita Spend Down up to \$5,000 per household. (Applicable to adults and youth) All per capita above \$5,000 will be counted as unearned income.
 - 1) Deductions may be applied to the total per capita received in the household.
 - 2) All deductions must be verified through receipts.
 - 3) All deductions must be thoroughly Case Noted in TAS.

- 4) Needy and Non-needy families are eligible for the [Per Capita Deduction](#).
- viii. Spend Down deductions must be [reasonable](#) and limited to the following:
 - 1) Rent/Housing Food
 - 2) Employment related expenses
 - 3) Cultural related expenses
 - 4) Utility Bills
 - 5) Transportation Related Expenses
 - 6) Clothing
 - 7) Debt Repayment
 - 8) Education-Related Expenses
 - 9) Child Care
 - 10) Personal Care (Health & Hygiene)
 - 11) Medical & Dental
- c. Income of SSI Recipients
 - i. Adults who receive SSI may be removed from the grant, or, if it is more beneficial to the welfare of the family, may choose to count that SSI income as Unearned Income and remain on the grant.
 - ii. All income of an adult or child who is receiving SSI and who is living in a Workforce Development – Cash Assistance household and is not a member of the AU will be disregarded in determining eligibility and payment amounts of applicants and recipients.
 - iii. In situations where the only dependent child in the AU is a Social Security recipient who has been excluded from the grant, eligibility for the family no longer exists because there is no dependent child on the grant.
 - iv. If an adult or child receives SSI they may be removed from the grant. In this situation it would only be advisable to include the adult or child if the amount of SSI received is less than their portion of the cash grant amount. Workforce Development staff should determine with the family the most financially beneficial situation for that particular household. Workforce Development staff should take into consideration need for support services when making the decision.
 - v. Cash Assistance recipients within a household and all excluded SSI persons living together will be treated as completely separate AUs, regardless of the legal or family relationships between them.
- d. Workforce Development Cash Assistance Applicants/Participants with Potential SSI Eligibility
 - i. Any cash assistance applicant who resides with an adult or child who has

potential eligibility for the SSI program shall be referred to SSI.

- ii. The Workforce Development staff must determine cash assistance eligibility under normal procedures, including a member of the AU who has a pending SSI application.
- iii. If the first SSI check is received in the same month as a cash assistance grant check, the SSI amount of the grant for that month shall be recouped.
- iv. If the SSI check received makes the family ineligible for services, then the total cash assistance grant amount will be recouped along with any other ineligible expenditures.

7. Calculating Prospective Income.

a. Calculating Income

To anticipate income as accurately as possible, the Workforce Development staff needs to know:

- i. The amount of income actually received in at least the last 30 days;
- ii. Any income the client still expects to receive in the remainder of this month; and
- iii. All those factors known or anticipated, which might cause the month's income to differ in amount or type from that received and expected to be received in the current month.

b. Calculation of monthly earned income using prospective calculations

- i. Prospective calculations means calculating income using an estimate based on knowledge of current, past, or future circumstances.
- ii. Use the actual and expected income the first month of cash assistance, allowing for the fact that the prior thirty to sixty days may not be representative of anticipated amounts for the current month.

1) Garnishments and Child Support as documented on Pay Stub may be deducted from gross monthly income to determine total earned income.

- iii. If there is only a partial month of income available, multiply gross income by 4.3 for weekly amounts, 2.15 for bi-weekly amounts, 2 for semi-monthly amounts, or 1 for monthly amounts; and
- iv. Round to the nearest dollar to determine the monthly amount to be anticipated for the benefit month(s).

c. Calculating the first three grants.

- i. The first month is based on prospective calculations of earned and unearned income, unless actual income for that entire month is available. This will only be allowable if the month is already over.
- ii. The second month is also based on prospective calculations of earned and

unearned income, unless actual income for that entire month is available. This will only be allowable if the month is already over.

- iii. The third month will be based on actual income of the first cash assistance month and three-month logic will be used, (see Issuing the Initial Payment for details).
- iv. Any grant issued using prospective calculations shall not be affected by the difference in actual income for that month, whether that amount is larger or smaller. No overpayment or underpayment will be implemented for the months using prospective calculations.

For example, if a family applies in October and the prospective calculation of earned income is \$1,000, but the actual earned income is later determined to be \$1,200:

In the Month of:	October	October	November
Using Income Entered for:	October Estimated \$1,000	October Estimated \$1,000	October Actual: \$1,200
Grant Amount: Income - \$800 disregard and divided by 2.	October \$1,000 - \$800 = \$200, \$200 / 2 = \$100 Grant is reduced by \$100.	November \$1,000 - \$800 = \$200, \$200 / 2 = \$100 Grant is reduced by \$100.	December \$1,200 - \$800 = \$400, \$400 / 2 = \$200 Grant is reduced by \$200.

I. Resources

1. A resource is cash or an asset that can be converted to cash.

2. Determining Value of Resources

- a. A family or child will not be eligible for Cash Assistance Services if they have countable (non- excluded) resources in excess of \$5,000.
- b. All resources must be reported, and determination of exclusion will be made by program staff.
- c. The “one day-one month” principle applies to resources. If a family is eligible for one day of the month, they are considered eligible for the entire month. (This does not apply to income.)
- d. Verification of value and ownership of resource must be documented in the case file and Case Noted in TAS.
- e. Fair Market Value
 - i. Fair market value may be determined by checking with realtors, real estate agents, classified advertisement listings, the tax assessor’s office, stockbrokers, insurance agents, accredited fair market value website, or other sources as appropriate.
 - ii. If the fair market value of a particular resource cannot be determined exactly,

establish its fair market value by determining the value of comparable property which is being offered for sale or which has been recently sold in the vicinity.

- iii. Once fair market value is determined, the total amount of all legal encumbrances must be established and subtracted from the fair market value amount. A "legal encumbrance" for Workforce Development – Cash Assistance Services means any amount owed to another party that is enforceable by a legal action.

3. **Countable Resources** – The resource limit can be reached by any combination of countable resources listed:

- a. Cash on hand or in bank;
- b. Personal Property and Real Estate – examples include mobile homes, trailers, boats, snow machines (unless it is a home the client resides in or uses for employment);
- c. Stocks, Bonds, and Securities – All bonds (United States Government savings bonds or treasury notes, municipal or government bonds, or corporate bonds), all stocks (common or preferred shares of business organizations) and securities.
- d. Cash value of life insurance (determine whether the value is face value or cash surrender value);
- e. Joint Bank Accounts that are not for Protective Payee services to another individual (consider source of funds, intent of parties named on account and actual use to determine whether the account is available to the cash assistance family);
- f. Motor Vehicles (other than those excluded – see next column);
- g. Lump sum payment – such as a severance, insurance policy payout, retroactive Social Security benefits, medical payments, cash settlements, inheritances etc. (count lump sum income in the month received and treat remaining amount from lump sum payments as a resource in the months following receipt); and
- h. Per Capita payments based on gaming – (count per capita as income in the month received and treat as a resource the month following receipt if still available).

4. **Excluded resources that are not counted against the resource limit are:**

- a. Conversion or Sale of a Resource – (e.g., trading a vehicle for another, sale of a vehicle, pawning an item for cash);
- b. SPIPA IDA funds;
- c. The home the client lives in;
- d. Resources that are used for employment (e.g., boat, truck, dive suit);
- e. Native Restricted Deeds – lands that cannot be sold without the acquiescence of another;
- f. All compensations received under ANCSA per public law;
- g. Authentic Native art and cultural items;

- h. Refunds and Reimbursements – (e.g., refund of a rental deposit, income tax refund, merchandise refund, retirement fund cash-out);
- i. Monies received to operate as a Formal or Informal trustee, payee or financial guardian for another person.
- j. An operable motor vehicle. One vehicle for a single parent family. Two vehicles for two-parent families if both parents are using a vehicle for independent work activities;
- k. Lump sum payments – These are specifically designated or used for the purpose for which it is paid, such as burial/funeral expenses or medical bills; and
- l. All per capita that is considered excluded by public law (e.g., natural resources, judgment and settlement funds, receipts from trust lands, etc.)

J. Determining Sixty-Month Assistance Limit During Intake

1. Countable Months of Assistance

- a. There is a sixty-month **lifetime** limit on benefits. CFR 286.115 states “a tribe may not provide assistance to a family that includes an adult or minor head of household who has received assistance beyond sixty months.”
- b. Verification of all past months of assistance (state and tribal) is required for the purpose of calculating the sixty-month time limit.
 - i. State and other Tribal TANF/Cash Assistance Programs will determine whether previous months a client has accrued on their program were countable or uncountable.
 - ii. Please note that TAS will record and accrue all months while a client is receiving services from the Program, both countable and uncountable.
- c. Program staff must verify all instances (state and tribal) of TANF/Cash Assistance reported and unreported, (e.g., if a client comes from another area, the Program staff are responsible to contact any tribe or DSHS in that area to verify the months of TANF/Cash Assistance received including countable and exempt months). TICS must be verified for ALL adults in the AU.
- d. The sixty-month period begins the first day that an AU receives a cash grant from any state or tribal TANF/Cash Assistance Program.
- e. Calculating countable months in 2-parent households – Calculate the months separately for each adult. The household is determined to reach 60 months when any of the household members reach 60 months. They will accrue months together while still members of the household, and should they separate, the months will follow each of them.
- f. If a household closed for time limits, and the person who had 60 or more months on cash assistance leaves the household, and the remaining household members have not yet reached the time limit, they may be eligible for cash assistance services pending other eligibility criteria.

- g. If an applicant applies for Cash Assistance Services with sixty months or more of TANF/Cash Assistance, they are not eligible for the Service and an immediate referral to the DSHS will be provided to the non-eligible family.
- h. Workforce Development intake staff will enter TICS (state and tribal) into TAS – TANF/Cash Assistance Adult History and Case Note. Edits to TANF History will need to be entered by Workforce Development Team.

K. Tribal Enrollment

1. General

- a. Cash Assistance applicant must show proof of enrollment from a federally recognized tribe in order to be eligible for the Program.
- b. For a 1 or 2-Parent Applicant – a member in the assistant unit must be enrolled in a federally recognized tribe.
- c. For a Child Only Applicant – either the child receiving the service or the caretaker must be enrolled in a federally recognized tribe.

2. Documentation

- a. Proof of enrollment shall be verified with an enrollment card or written verification from a federally recognized tribe.
- b. If the applicant has no documentation no services can be provided. The program staff should assist with contacting the appropriate Federally Recognized Tribe, Alaska Native Tribe or Village for specific enrollment information.
- c. Workforce Development Staff should use the most current official list of Federally Recognized Tribes which can be found at: <https://www.ncsl.org/research/state-tribal-institute/list-of-federal-and-state-recognized-tribes.aspx#federal>. For contact information, the following website can be used to search the most recent contact data: <https://www.bia.gov/bia/ois/tribal-leaders-directory/>. Please note that the email address may be for the tribal chair and may not get you access to enrollment information, but the phone number should.

3. Guidance for Alaska Native Associations/Corporations

- a. Enrollment in only an Alaska Native Association/Corporation doesn't count as being enrolled in a federally recognized Tribe or Village.
- b. If the Alaska Native cash assistance applicant does not have proof of enrollment in a federally recognized Alaska Tribe or Village, the Workforce Development Staff should contact the specific Alaska Tribe or Village enrollment officer to obtain a document verifying that the applicant is enrolled.
- c. CIB (Certificate of Indian Blood) - If the Alaska Native has a CIB, this certificate is not enough to verify enrollment in an Alaska Native Tribe or Village. If an applicant presents a CIB, the Workforce Development Staff should contact the appropriate Alaska Native Tribe or Village for specific enrollment documentation.

- d. If the Program staff is unable to verify enrollment beyond the association or corporation the applicant is not eligible for services.

L. Citizenship and Eligible Alien Status

1. Citizens, Nationals or Qualified Aliens

- a. Each applicant for Cash Assistance Services must provide proof that they are:
 - i. A citizen or national of the United States; or
 - ii. A qualified alien.
- b. A qualified alien for cash assistance purposes is a person who is:
 - i. An alien who is lawfully admitted for permanent residence;
 - ii. An alien who is granted asylum;
 - iii. A refugee;
 - iv. An alien granted parole for at least one year by the Immigration and Naturalization Service (INS);
 - v. An alien who has had deportation withheld under section 243(h) of the Immigration and Nationality Act (INA);
 - vi. An alien granted conditional entry under immigration law in effect before April 1, 1980; or
 - vii. A battered spouse or child of a U.S. citizen or permanent legal resident.
- c. Qualified aliens who entered the U.S. before August 22, 1996:
 - i. These persons may receive cash assistance benefits right away if they are otherwise eligible.
 - ii. Documentation is required in the file and Case Noted in TAS.
- d. Qualified aliens who enter the U.S. on or after August 22, 1996:
 - i. Most qualified aliens who enter the U.S. on or after August 22, 1996 are not eligible for cash assistance benefits for five years after their date of entry.
 - ii. Exceptions to this are listed in Section 2, M3, entitled "Five-Year Bar".

2. Income and Resources

- a. The resources and income of a parent who is in the home and is found ineligible due to Section M1 above shall be used to calculate the grant.
- b. Documentation is required in the client's file and must be Case Noted in TAS.

3. Five-Year Bar

- a. Qualified aliens who arrived in the U.S. on or after August 22, 1996, are prohibited from receiving cash assistance benefits until they have been in the U.S. for five years or until they become U.S. citizens.

- b. This five-year bar does not apply to the aliens listed below:
 - i. Refugees under Section 207 of the Immigration and Naturalization Act (INA), who have not been in the U.S. more than five years;
 - ii. Asylees under Section 208 of the INA, who have not been in the U.S. more than five years;
 - iii. Aliens whose deportation has been withheld under Section 243(h) of the INA for the first five years from the grant of withholding of deportation; or
 - iv. U.S. military veterans or active-duty military, their spouses, and dependent children.
- c. Aliens falling into these categories may immediately qualify for cash assistance, regardless of their date of entry into the U.S.

4. Ineligible Aliens

- a. General
 - i. Any alien who is not a "qualified alien" is not eligible for cash assistance.
 - ii. Non-qualified aliens include aliens who are permanently residing in the U.S. under Color of Law, non-immigrants, and illegal aliens.
- b. Permanently Residing Under Color of Law (PRUCOL)
 - i. Aliens in this category are legal permanent residents of the U.S. even though they did not go through the process of applying for and being admitted for permanent residence.
 - ii. This group includes non-qualified aliens residing in the U.S. with the knowledge and permission of the INS whose departure the INS does not contemplate enforcing.
- c. Non-Immigrants
 - i. Some aliens may be lawfully admitted but only for a temporary or specified time (visitors, tourists, students, diplomats, crewmen on shore leave, temporary workers, members of the foreign press, etc.)
 - ii. These aliens are not eligible for cash assistance because of the temporary nature of their admission status.
- d. Illegal Aliens
 - i. An illegal alien is any alien who either was never legally admitted to the U.S., or was admitted for a limited period of time and did not leave the U.S. when that time expired.
 - ii. These aliens are not eligible for cash assistance because of the temporary nature of their admission status.

Child Support at Intake – for more details see Child Support in the Program Standards Section

1. All families, except those who have both parents of all children in the household within the home, shall complete the Child Support Assignment and Referral and supply information to assist in the collection of child support, otherwise the Cash Assistance case will not be opened.

2. Good Cause Exemption from Child Support Requirement

- a. If a custodial parent or caretaker has experienced domestic violence perpetrated by the non-custodial parent, an Exemption may be granted with Site Manager approval. This must be thoroughly documented in the file and Case Noted in TAS.
- b. Documentation evidencing domestic violence may consist of:
 - i. Statements or other documentation from a representative of a child protection agency;
 - ii. Statements from domestic violence agencies;
 - iii. Law enforcement reports;
 - iv. Court orders;
 - v. Documentation from another agency that provides similar services; or
 - vi. If none of the above can be acquired, the applicant may provide a signed statement of how complying with this requirement may endanger the health and safety of the family, which will be approved by the Site Manager on a case-by-case basis.
- c. All forms shall be maintained in client's case file and thoroughly documented in TAS Case Notes.

3. Child Support at Intake

- a. If the child support that a Client receives is greater than the monthly cash assistance grant amount, then the Client is not eligible.
- b. If a client is receiving direct child support at the time of intake, that income shall be considered unearned income. The Program shall pass-through up to \$150 to the CP per child, per month pursuant to the Child Support Order. The Program shall not count the \$150 pass-through against the monthly cash assistance grant. Direct child support amounts that are not passed through to the CP shall be entered as unearned income under the Adult's Income screen and shall be calculated against the grant.
- c. Documentation is required in the client's file and must be thoroughly Case Noted in TAS.
- d. All pass-through payments shall be entered in the Child's Income screen by the Workforce Development Staff.

4. Changes in Household

A DCS Child Support Change Notice shall be completed and sent to the appropriate DCS Office whenever a child or adult enters or leaves the AU.

Copies shall be provided to the SPIPA Child Support Coordinator. This must be thoroughly documented in TAS Case Notes.

M. Factors to Consider at Intake

1. Residence of the Child

The primary factor to consider is the location of the child when determining if a child resides with a parent or caretaker relative. A child is required to live in the residence no less than 75% of the time in a calendar month, except in cases of temporary absence of a child from the usual place of residence. See *Temporary Absences from the Home below*.

2. Multiple Grants in the Household

- a. If a person applies for cash assistance while living with a current cash assistance client, the application may be processed, and eligibility determined as with any other case as long as the applicant and/or the children for whom s/he is applying are not included in the other existing AU.
- b. Examples:
 - i. Two non-married adults who reside in the same home with their respective dependent children may be eligible for the Program, provided that, eligibility exists for each AU independently.
 - ii. A 1 or 2-Parent AU may exist concurrently with a Child Only grant, provided that eligibility criteria are met individually for each AU.

3. Child Only

- a. Households shall be limited to one Child Only AU at a time.
- b. Proper documentation must be provided to determine placement and custody of each child.
- c. If the biological parent(s) reside in the same home, the resources and eligibility are determined without including the biological parents.
- d. Caretakers of children who are placed with them who are receiving assistance from another program are not eligible for cash assistance from the WFD Program.

4. Married Adults

- a. Married adults must both be included in the household if they share the same physical address.
- b. One parent may be excluded if they receive SSI. The Workforce Development staff must conduct research to identify all dependents receiving benefits to avoid the duplication of service. The clients may be referred to see if their children are eligible for Dependent Benefits.
- c. If both parents receive SSI, then the case may become a Child Only.

5. Unmarried Adults Living Together as a Couple

Unmarried adults living together as a couple may be considered a two-parent family, whether or not they have a child in common. See the section on Two-Parent families in Definitions of Types of Families details on when they need to be counted as Two-Parent families.

6. Change of Case Type

- a. Child Only cases may become a 1-Parent or 2-Parent (Needy Caretaker) cash assistance case if the adults agree to complete monthly Work Participation (unless exemptions are granted) and the family meets all eligibility requirements.
 - i. The case and intake number may remain the same, but the case type will change.
 - ii. The adult(s) must be changed to active members of the case and have their Family Affiliation changed to "on the grant..."
- b. At times adults enter and leave the home, 1-Parent and 2-Parent cash assistance cases will be adjusted to reflect those changes.
 - i. If the adult that is leaving is the head of household, the family must reapply for cash assistance with a new application. Other documents may be copied from their old file. The Intake note should reference their former case number as well.
 - ii. If the adult that is leaving is not the head of household, then no new application is needed, but Workforce Development staff must verify eligibility still exists.

7. Child Resides with Both Parents Under a Joint Custody Arrangement

- a. Only one parent may receive cash assistance benefits for the child in any month as defined in a valid custody order.
- b. If joint custody is court ordered, a primary custodian must be designated in the court order. The primary custodian may be eligible to receive cash assistance benefits. This is an [exception](#) to the requirement that a child is required to live in the residence at least 75% of the time in a calendar month.

8. Temporary Absences from the Home

- a. Adult
 - i. A temporary absence for an adult is defined as an absence when the adult is expected to return to the home and the absence is due to one of the following reasons:
 - 1) Incarceration for up to 30 days
 - 2) Rehabilitation program (substance abuse, addiction, medical, mental health) for up to 90 days
 - 3) Vocational Training (only when not available locally) for up to 90 days

- 4) Reportable Employment away from service area for up to 90 days
 - a. If the absent adult is the only adult in the AU, then the case shall be closed.
 - b. If the absent adult is the only non-needy caretaker, then the case shall be closed. If the absent adult is the HH, then the case may enter pro-pay to stay open as is or be closed and reopened under another eligible HH.
- b. Child
 - i. A temporary absence is defined as an absence of no more than three months when the child is expected to return home and is due to one of the following reasons:
 - 1) Court ordered visit to other parents for up to 90 days
 - 2) Rehabilitation programs (substance abuse/behavioral) for up to 90 days
 - 3) Boarding school for the documented school year
 - 4) Court ordered juvenile detention facility for up to 90 days
 - ii. If a person applies for services with a child who is a member of another household, but absent as above, they will not be eligible for services for that child until the child is removed from their current grant. We cannot have anyone as an active person on more than one grant. Duplication of services is prohibited.

9. Social Security - Received by Child

- a. In situations where the only dependent child in the AU is a Social Security recipient who has been excluded from the grant, eligibility for the family no longer exists because there is no child on the grant.
- b. At times when the Social Security Income is less than the Cash Assistance Grant it may be possible for the child to remain a part of the AU. That income will be counted as unearned income. Workforce Development staff should determine with the family if it is better to keep the case open and reduce their benefits dollar for dollar or remove the child and reduce the grant amount per family size.
- c. The child will still be eligible to receive Support Services if their income was used to determine the amount of the grant.
- d. If the child was excluded from the Program AU, then that child will not be eligible to receive any Support Services / Emergency Support Service or Incentives.
- e. SSI Income of an excluded child is excluded from the household's income, as defined in the income section.

10. Social Security – Received by Adult

- a. Parent Family:
 - i. A family with two parents, and one of the parents is excluded from the grant

due to receiving Social Security. Parent may be a natural, adoptive, or step-parent of a minor child in the family. Either parent or any of the children may be enrolled in a federally recognized tribe to satisfy the requirement of at least one member of a federally recognized tribe.

- ii. The excluded adult's Social Security income does not count towards the household's income when determining eligibility or calculating a grant.
 - iii. The excluded adult's earned income does count towards the household's income.
- b. Child Only:
- i. A family where all of the parents in the household are excluded from the grant due to receiving Social Security. Parent may be a natural, adoptive, or step-parent of a minor child in the family. A parent or any of the children in the household may be enrolled in a federally recognized tribe to satisfy the requirement of at least one member of a federally recognized tribe.
 - ii. The excluded adult's earned and unearned income does not count towards the household's income when determining eligibility or calculating a grant.
 - iii. The child's unearned income will still count towards the household's income.

11. Pregnancy Grant

- a. A pregnant woman with no other children in the home can receive a cash assistance payment as a one-parent, one-person household
- b. Pregnancy grants are for the mother only and cannot become a 2-parent grant until the child is born. Normal procedure is followed for adding an Adult and/or Child to the grant.

12. Minor Head of Households (HH)

- a. A Minor HH is an individual who is under age 18; not married; and has a minor child of her own or is pregnant.
- b. A minor parent who is married is a two-parent family (or one-parent if the spouse is absent from the home).
- c. Eligibility Requirements and Responsibilities
 - i. Live under adult supervision. The Minor HH must reside in a responsible adult-supervised living arrangement approved by the Site Manager in consultation with the parent/guardian. The adult-supervised setting may be waived if:
 - 1) the Minor HH has no parent, legal guardian, or other appropriate adult relative of his or her own who is living or whose whereabouts are known;
 - 2) no living parent, legal guardian, or other appropriate adult relative, who would otherwise meet applicable State criteria to act as the Minor HH's legal guardian, of such Minor HH allows the them to live in the home of such parent, guardian, or relative;

- 3) the SPIPA Workforce Development Program determines that—
 - a) the Minor HH or the minor child is being or has been subjected to serious physical or emotional harm, sexual abuse, or exploitation in the residence of the Minor HH’s own parent or legal guardian; or
 - b) substantial evidence exists of an act or failure to act that presents an imminent or serious harm if the Minor HH and the minor child lived in the same residence with the Minor HH’s own parent or legal guardian; or
 - 4) the Site Manager otherwise determines that it is in the best interest of the minor child to waive the requirement with respect to the Minor HH or the minor child.
- ii. School attendance requirement. The minor parent must attend school or another appropriate training program, if the minor parent does not have a high school diploma or its equivalent;
 - iii. Minor head of household must continue to attend school even after the child is born. According to Title IX of the Education Amendments of 1972: “No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.” Therefore, “a school must excuse a student’s absences because of pregnancy or childbirth for as long as the student’s doctor deems the absences medically necessary” and will be deemed in compliance with the SPIPA Workforce Development Program - Cash Assistance Service requirements.
 - iv. Payment restrictions. The cash assistance payment will be paid to a protective payee.

d. Minor HH’s Household

Who must be a part of the minor parents’ AU depends on who chooses to apply.

- i. For example, if a mother under 18 applies for herself and her child, this minor parent and her child are in the AU. If the supervising adult she is living with has a cash assistance case as well, they may still open as a separate case, so long as no members of household are on the grant of the other case. (The adult supervisor is not part of the grant of a Minor HH.)
- ii. If this minor parent lives with her parent, and her parent applies, the minor parent may be considered to be a dependent child and instead of being a supervising adult with a Minor HH, the supervising adult will be the HH, and the minor parent will be the child (along with any eligible siblings of hers).
- iii. If the family chooses to not to have a Minor HH, but have the supervising adult be the HH instead, they may have an additional Child Only case with the minor parent’s child.

e. Adult Supervised Living Arrangement

An adult-supervised living arrangement is a one that provides a safe, supportive, and secure environment for the Minor HH.

N. Issuing the Initial Payment

1. General

- a. The first payment will be made once eligibility has been determined and the Eligibility Statement has been completed.
- b. The first payment made to applicants shall be prorated. TAS will prorate the payment based on the date entered as the "Effective Date" in the Family Intake Screen.
- c. Clients should be counseled that prorated payments count against their 60-month time limit and it may be advisable to wait to the start of the next month prior to issuing the first Assistance Check.
- d. The first cash assistance payment month is used as the income month for processing the Assistance Check the first three months. After processing the first two months of assistance, the [three-month logic](#) will apply.

In the Month of:	October	October	November	December
Create Assistance Check for:	October	November	December	January
Using Income Entered for:	October (it may be necessary to estimate income)	October (it may be necessary to estimate income)	October (actual income if available)	November (actual income if available)

2. Recoupment of prior overpayments at Intake

- a. Staff conducting intake is required to research any prior overpayments with the Program.
- b. If any exists, confirm calculated amount and make note on Eligibility Statement and Case Note in TAS.
- c. Case Manager shall reestablish the repayment plan and send a notice to the client of the reinstated repayment.

O. Diversion

1. General

- a. Diversion provides a limited emergency assistance benefit to families that meet the eligibility criteria for cash assistance, but don't require ongoing monthly cash assistance. Diversion provides brief, emergency assistance to eligible families in crisis.

- b. Families who receive Diversion assistance are not subject to a sixty-month time limit, required to participate in work requirements, or required to assign child support.
- c. Diversion Assistance does not count towards the client's sixty-month time limit.
- d. The purpose of Diversion is to divert a family from coming on WFD – Cash Assistance Services. The family may be required to repay a pro-rated portion of the money received if they go onto WFD – Cash Assistance Services before 6 months. The family will not be required to repay if there is a loss of employment due to circumstances beyond their control. The circumstances must be documented and approved by the program manager.
- e. Clients who elect to participate in Diversion are not eligible for Incentives unless the proposal specifically allows for it.

2. Eligibility

All of the following must exist for eligibility for Diversion Services:

- a. Family must provide a statement of the need for the benefits and how it will help them maintain employment.
- b. Families must be within 200% of the Federal Poverty Guidelines for their family size, which can be found at: <https://aspe.hhs.gov/poverty-guidelines>.
- c. To calculate eligibility, Workforce Development Staff must compare the family's annual income by averaging what the family earns per month and multiplying that number by 12, or by averaging what the client earns per week and multiplying that by 52. Either method is acceptable.
- d. Families must meet all other non-income eligibility criteria for the WFD – Cash Assistance Services.

3. Maximum Amount of Diversion Assistance per Family

Families are eligible for only four consecutive months per year and may receive a maximum benefit of \$4,000.

4. Allowable expenses under Diversion

Diversion can help with expenses up to \$4,000 in any combination of the services described in the Support Services and Emergency Support Services section of the Client Services Section of this manual.

5. Repayment of Diversion

- a. The purpose of Diversion is to divert a family from needing cash assistance services. The family must repay a prorated portion of the money received if they apply for and receive cash assistance services because they quit or were fired from a job before 6 months from the last time they received Diversion assistance.
- b. If they lost their employment due to circumstances beyond their control, they will

not be required to repay the program. The circumstances that caused their loss of employment must be documented and approved by the program manager. Such reasons may include, but are not limited to:

- i. Employer business closed,
 - ii. Employer business relocated,
 - iii. Employee laid off, and
 - iv. Employee quit with good cause approved by site manager.
- c. To calculate the amount owed back to the program use the following calculation:
- i. Take the total amount of Diversion services received and divide by 6. Subtract out the portion attributed to the months that have passed and the Client is not on cash assistance during the 6-month period.
 - ii. The portion attributed to the months left is the amount the client will be required to pay back to the Workforce Development Program - Cash Assistance Services.
 - iii. For example, client receives a total of \$1,200 Diversion assistance. $\$1,200$ divided by 6 months = $\$200$. The client has only been able to stay off of cash assistance for 4 months. $\$200 \times 4 = \800 . The $\$1,200$ minus $\$800$ equals $\$400$. The client will need to establish a repayment plan for the $\$400$ prior to coming onto cash assistance.

6. Staff Procedure

- a. Sometimes it is more fiscally beneficial to the Client to be brought onto regular cash assistance than participate in Diversion.
- b. When a case is in Diversion it must be set up in TAS as a Diversion Case.
- c. All PO or check requests are processed out of TAS as Support Services and/or Emergency Support Services.
- d. Case shall be thoroughly documented in TAS Case Notes.

2 – Program Standards

A. Annual Recertification

1. Annual recertification must be completed every year for every cash assistance household.
2. The next review date should be set one year from the most recent review date.
3. Current clients shall renew their ACES, releases of information, and all expired eligibility documents annually, or their case shall be closed.
4. Clients shall be notified at least 15 days before their review date and will have until the end of the month to renew their cash assistance application.
5. Clients who do not renew their cash assistance application shall be sent a 10-day closure notice.

B. Non-Duplication of TANF Benefits

1. Current cash assistance clients may not receive assistance from another TANF/Cash Assistance or assistance type program.
2. If a duplication of benefits is suspected, the client shall be investigated for fraud.
3. If a duplication of benefits is discovered, benefits shall be recouped by the second payer of the benefits.

C. School Enrollment for Children

Failure of parents to send children to school or the failure of children to attend school contrary to applicable law will result in a sanction warning for school attendance and referral to appropriate programs as mandated by law.

1. Participant(s) Responsibilities

- a. A dependent child ages 6 – 17 must be enrolled and attending school, or have completed secondary school.
- b. A dependent child age 18 must be a full-time student and attending in a secondary school (or in the equivalent level of vocational or technical training or other program as approved by Program Manager.)
- c. It is the responsibility of clients to submit school documentation of attendance to their Case Manager no less than 45 days after the last day of the school's semester/quarter.

2. Failure to Comply

See the School Attendance Sanction section of Program Standards.

D. School Enrollment for Adults

Clients without a high school diploma or its equivalent who are under 50 years of age are required to attend High School courses, GED or Adult Basic Education (ABE) classes, Vocational School, Technical School, or other educational program that will allow the client to obtain their High School Diploma or its equivalent. Non-exempt Cash Assistance Clients

who refuse to work towards their Adult Education Goals shall be subject to the Sanction process.

1. **Clients who have a learning disability** which may make this requirement a barrier to their self-sufficiency, may be exempt from this requirement if no accommodations can be made, and after all available options have been exhausted. Exemptions must be staffed with recommendation from the instructor, case manager, site manager, and Workforce Development team, and approved by the program manager. All exemptions must be thoroughly documented.
2. **Clients will be assigned the applicable classes as a work participation activity.** Clients must attend each day a class is in session, any absences must be approved by their case manager.
3. **Clients who are 50 years of age or older** may still choose to have obtaining their high school diploma or its equivalent as a work participation activity but are not required to.

E. Sixty-Month Assistance Limit and Hardship Exemption:

When a family member reaches the end of 60-month time limit, cash assistance to a family will end unless the AU has been approved for a Hardship Exemption.

1. Countable Months of Assistance

See Intake Standards for determining months that count toward the 60-month time limit.

2. Months that Do Not Count

- a. **Minor children:** A month in which an individual receives cash assistance as a dependent minor child is not counted.
- b. **Suspended Workforce Development case:** A month in which the cash assistance case is suspended and no cash assistance is paid does not count as a month of assistance.
- c. **Recouped Grants:** A month does not count in which a family received a cash assistance payment in error, of which the entire amount of cash assistance has been repaid to The Program.
- d. A month in which a family receives Diversion or Transitional services and not cash assistance is not considered a month of assistance for the purposes of the sixty-month limit.
- e. A month in which a family lives on a reservation that has a 50% or greater not employed rate is not considered a month of assistance.

F. Hardship Exemption

1. Hardship Exemptions to the 60-month time limit

- a. Exemption from WP does not stop the 60-month time limit or automatically guarantee granting Hardship Exemption.
- b. A family that qualifies for a Hardship Exemption may still be required to participate in Work Activities unless they also have a WP exemption.
- c. Families in Hardship Exemption will need to be actively working towards their [ISP](#), with the goals outlined in their Hardship Exemption Request (HER).

2. Determining Hardship

- a. Notice and Hardship Exemption Request
 - i. Clients shall receive notice during their 48th month of countable assistance that they have one year left on cash assistance. Applicants who enter the program on or after their 48th month will receive a similar notice of the amount of time they have left on cash assistance.
 - ii. Clients will be informed that they may complete a HER if they meet the criteria to extend their time beyond 60 months. HERs will be available at the Workforce Development sites for the client to obtain, fill out, and return.
 - iii. Failure to return a HER will automatically result in benefits ending at 60-month date.
- b. Hardship Exemption Determination Process.
 - i. Upon receipt of the written request packet from the client, the Case Manager will Case Note the receipt of the HER and forward to the Site Manager with their recommendation for approval or denial.
 - ii. The Site Manager will approve or deny the request, and, if approved, the request will be forwarded to the [Workforce Development Team](#) for review.
 - iii. A final recommendation from the team will be made to the Program Manager. Final determination will be made by the Program Manager.
 - iv. Once approved, the Case Manager must Case Note the approval and, on the Client's 60th month of cash assistance, change their Exemption Status in TAS under cash assistance intake to the appropriate exempt status.
 - v. Hardship Exemptions will be granted on a case-by-case basis after examining the family's circumstances and are not automatic.
 - vi. A client must meet the following criteria to be considered for Hardship Exemption:
 - 1) Current reasonable supporting documentation of at least one of the Exemption Criteria. *See Exemption Criteria requirements below.*
 - 2) Compliance with Program Standards/Requirements.
 - 3) Have a clear goal stated on their HER that they can actively work toward to

achieve economic self-sufficiency.

- vii. Final notification will be issued to the client within 30 days after the Case Staffing has occurred.
- viii. Exemption status will be re-evaluated at a minimum, every 6 months to determine continuation of exemption status for clients.

3. Exemption Criteria

Hardship Exemptions shall be determined on a case-by-case basis and are not automatically granted. Families that meet one or more of the following criteria with current supporting documentation may be considered for hardship exemptions:

- a. **Physical Abuse** – Supporting documentation may include reports, written statements, court orders, and/or declarations from child protection agencies, courts, and/or law enforcement agencies.
- b. **Sexual Abuse** – Supporting documentation may include reports, written statements, court orders, and/or declarations from child protection agencies, courts, and/or law enforcement agencies.
- c. **Threats of or Attempted Physical or Sexual Abuse** – Supporting documentation may include copies of police reports and/or written statements from medical/mental health professionals.
- d. **Mental Abuse** – Supporting documentation may include written statements from a medical or mental health professional.
- e. **Neglect or Deprivation of Medical Care** – Supporting documentation may include written statements from a child protection agency, or medical/mental health professional.
- f. **Individuals with Disabilities** – Supporting documentation may include written statements, reports, and/or declarations from licensed professionals. The disability must limit their actual ability to gain and/or maintain employment in the short term.
- g. **Single Parents with Four or More Children in Their Custody Under the Age of 12** – Supporting documentation shall include Birth Certificates and eligibility documents.
- h. **Adults Responsible for the Care of an Elder or Disabled Relative** – Supporting documentation shall include a current doctor's statement. Such exemptions are determined based upon severity of the need.
- i. **Hardship/Other** – Supporting documentation may include documentation that demonstrates a unique circumstance that threatens the health, safety or welfare of the family.

4. Requirements for Clients in Hardship Exemption

- a. ISPs will state employment goals and activities to remove barriers towards obtaining employment goals.
- b. Cash Assistance Clients shall meet with the Case Manager and Site Manager every

6 months to determine continued eligibility for the exemption. A member of the Workforce Development Team may also be present in the meeting.

- c. Continued progress in the removal of barrier(s) to employment.
- d. Cash Assistance Client shall maintain compliancy with all Program Standards. In the case of a two-parent household, both parents must maintain compliancy. If client receives any level of Sanction, their Exemption will be withdrawn at the end of the current benefit month, and their case shall be closed. This decision is final and not subject to appeal.
- e. Clients in Hardship Exemption who receive a Sanction Warning will still be given time to provide a Good Cause reason to avoid the Sanction.
- f. Clients whose children are placed in school attendance sanction may remain open.
- g. When the client is no longer eligible for cash assistance services, the case will close and may not reopen again. If services end due to Earned Income, they will be eligible for Transitional Services.
- h. Clients who are placed in Suspension or Fraud Investigation may remain open and eligible until the case officially closes.

5. Hardship Exemption is NOT Granted

- a. If Exemption status is denied, then the case shall be terminated upon reaching 60 months.
- b. The denial is final and not appealable.

G. Child Support

1. General

- a. The Program will close families when current assigned child support collections are in excess of the amount of normal cash assistance payments for their family size.
- b. If the child support collection is expected to exceed the normal grant amount for only one month, the case may be put into suspension for up to one month.
- c. Closures and suspensions will follow 3-month logic, so the case will close/suspend 2 months after the month of the excessive child support.
- d. DCS determines the amount of child support arrearage. Assigned arrears payments will be used solely to replenish the Program, and not passed through to the client.
- e. All cash assistance participants are required to cooperate with the State and Tribal Child Support Enforcement offices to establish paternity and establish/modify/enforce all child support orders for dependent child(ren) included in the family's AU.
 - i. Non-Cooperation with Child Support at Intake - If, at Intake, the family does not complete/sign the child support referral or supply information to assist in the collection of child support, then the cash assistance case will not be opened, unless Good Cause is established.

- ii. Non-Cooperation with Child Support after Intake - Once the cash assistance case has opened, if the client does not assist or cooperate with the State and Tribal Child Support Enforcement offices to establish paternity and establish/modify/enforce all child support orders for dependent child(ren) included in the family's AU, the case will be suspended for up to 15 days and then closed if child support cooperation is not established, unless Good Cause is established. All child support related activity should be documented in detail in TAS.

2. Good Cause for Non-cooperation with Child Support Requirement

- a. If a custodial parent or caretaker has official documentation evidencing domestic violence perpetrated by the non-custodial parent, Good Cause may be granted with Site Manager approval. This must be thoroughly documented in the file and Case Noted in TAS.
- b. Official documentation evidencing domestic violence may consist of:
 - i. Statements or other documentation from a representative of a child protection agency;
 - ii. Statements from domestic violence agencies;
 - iii. Law enforcement reports;
 - iv. Court orders;
 - v. Documentation from another agency that provides similar services; or
 - vi. If none of the above can be acquired, the applicant may provide a signed statement of how complying with this requirement may endanger the health and safety of the family, which will be approved by the Site Manager on a case-by-case basis.
- c. All forms must be sent to the appropriate Division of Child Support Office (DCS) with copies sent to the SPIPA Child Support Coordinator. Copies shall be maintained in client's case file and thoroughly documented in TAS Case Notes. If the information is sensitive, Private Case Notes may be used. If Private Case Notes are used, there will need to be a regular Case Note entered to refer to the Private Case Note.

3. Changes in Household

- a. When a child or adult **enters/leaves** the AU (but the case is NOT closing), the DCS Change Notice must be completed and sent to the appropriate DCS Office with copies sent to the SPIPA Child Support Coordinator if applicable.
- b. When it is a child entering the AU, the Child Support Referral must be completed and sent to DCS and the Child Support Coordinator when applicable.
- c. These actions must be thoroughly documented in TAS.

4. When a Case Closes

- a. When a cash assistance case closes the Case Closure Notice must be completed

and sent to the appropriate DCS Office with copies sent to the SPIPA Child Support Coordinator, when applicable.

- b. The notice shall include all months each applicable child has received cash assistance and the date of the closure.

5. Child Support Pass Through Payments from SPIPA

- a. When an absent parent makes child support payments on behalf of the child(ren) that are in a AU to the state or tribal enforcement office, the funds will be transferred to the SPIPA Child Support Office. Using the case's Basic Case Data sheet or Support Order, the Child Support staff will transfer up to \$150 per child(ren) per month through to the custodial parent for the needs of the child(ren) as identified on the DCS order.
- b. When Support Orders list several children (not individual orders per child) then the parent may receive the pass through for each child that has been listed on both Support Order and the SPIPA Workforce Development cash assistance grant.
- c. All Child Support received by SPIPA Workforce Development will be entered into the Income Section of TAS under the child's name by Child Support Staff and will not count against the grant. This information is entered into TAS for Federal Reporting Purposes only.
- d. Child Support Pass Through Payments will be issued by the 15th of each month for the prior month's child support collections received by SPIPA.

6. Child Support Payments from a Child Support Agency

- a. All child support payments must come to the SPIPA Child Support office.
- b. Once payment is received in the SPIPA Child Support office, payments (up to \$150 per child) will be passed through to the parent/caretaker by the 15th of each month for the prior month's child support payment.
- c. If a parent/caretaker receives a child support payment directly from another State or Tribal Child Support agency, the payment will count as unearned income disregarding the pass-through amount of up to \$150/per child/per month. When this happens, child support referral and assignment documents must be completed, signed, backdated to the date the case opened, and sent to the agency and to the SPIPA Child Support Coordinator immediately to redirect future payments to the SPIPA Child Support Coordinator per SPIPA policy.
- d. Parents shall not pick and choose which children will be in the AU. All children in the household will be considered part of the AU unless they are receiving Social Security money.
- e. If a child support agency will not forward funds to SPIPA Workforce Development and insists on sending the payments directly to the client, SPIPA Workforce Development shall receive monthly verification of these payments from either the child support agency or the client, and will count that income as Unearned Income, dollar for dollar against the grant, after disregarding up to \$150 per child as pass through.

7. Case Manager Procedures

- a. Do not complete or send referrals for any unborn children. The child support referral shall not be sent until the child is born.
- b. Newborn child(ren) shall not be added to the AU without the Child Support Referral and Assignment forms being completed, signed, and sent to DCS and the SPIPA Child Support Coordinator when applicable.
- c. Two-Parent Families
 - i. Case workers shall inquire whether all adults in the AU are the biological parents of all children in the AU. Do not assume that this is true without verification from the adults. Birth Certificates may be used to confirm paternity.
 - ii. When both parents are part of the AU and are the biological parents of all children in the AU, it is not necessary to complete any child support paperwork.
- d. The Child Support Assignment and Referral forms must also be completed and sent to DCS at Annual Recertification.
- e. A Case Note must be entered each time a Child Support Assignment and Referral form or DCS Change Notice is sent to DCS, documenting the names of the children, reason for sending, and the date it was sent.

H. Income

Please refer to Income as it Relates to Eligibility in the Intake Section policies on Income.

I. Special Circumstance to Consider with Households and Income

Please refer to Special Circumstances to Consider with Households and Income in the Intake Section.

1. Income Considerations for Current Clients

- i. Cash Assistance eligibility is determined on a calendar month basis.
- ii. One day, one-month rule: If a person is eligible for one day of a calendar month, they are eligible for the entire month. If eligibility ceases to exist due to children leaving the home, the family will no longer be eligible for that month.
- iii. Income is considered income in the month it was actually received.
- iv. Clients must submit verification of income by the 5th of the month with their work participation logs. If verification is not submitted, the Workforce Development staff may use the "Best Estimate" Income for one month. If all pay stubs or written verification from employer is not obtained by the 5th of the following month the Workforce Development staff shall follow case closure procedures.
- v. The first cash assistance payment month is used as the income month for processing the Assistance Check the first three months. After processing the first three months of Assistance, Three Month Logic will apply.

Three - Month Logic as it Applies to New Cash Assistance Clients

In the Month of:	August	August	September
Create Assistance Check for:	August	September	October
Using Income Entered for:	August (it may be necessary to estimate income)	August (use previously estimated income unless actual income is available)	August (use actual income)

Three Month Logic as it applies to client after the first 3 months of assistance.

In the Month of:	October	November	December
Create Assistance Check for:	November	December	January
Using Income Entered for:	September	October	November

2. Guidelines for Calculating Earned Income - ONLY to be used for existing cash assistance clients.

- a. Calculating Countable Earned Income
 - i. Whenever possible, use all paystubs received to verify monthly income.
 - ii. Count all gross income (before taxes) minus any garnishments and child support documented on the paycheck (only applicable to earned income).
 - iii. If pay stubs or written verification from employer are not received by the Case Manager, the Case Manager may use the "best estimate" method described below.
 - iv. The Best Estimate method may only be used to calculate one benefit month. If the client does not produce all paystubs or written verification from employer of actual income by the 5th of the following month the case will be closed. Case Manager will follow standard closure procedures.
 - v. Expenses associated with self-employment may be deducted from the countable earned income (e.g., gas, equipment, materials, etc.) using the Self-Employment Deduction Form.
- b. Best Estimate Calculation
 - i. Best estimate shall be calculated using the following:
 - ii. Full-time employment (40 hours per week) at Minimum Wage or verified wage history, whichever is larger;
 - iii. Multiplied by 4.3 to obtain the estimated gross income for the entire month.
 - iv. Round to the nearest dollar to determine the income amount to be calculated against the grant.
 - v. If partial income documentation is submitted, use the "best estimate calculation" at 40 hours per week, using actual wage.

- c. Staff Instruction
 - i. Staff shall attach pay stubs or other wage documentation to Work Participation Logs and place in physical file.
 - ii. Case manager shall clearly document in TAS Case Notes. The Case Note should contain, at a minimum, the following information: which household members had the income, who the employer is, and any deductions/garnishments.
- d. Earned Income Disregard
 - i. In order to encourage family members to work, earn income and improve the lives of their children, The Program will not count the first \$800 of the combined adult income each month.
 - ii. Earned Income Disregards will be programmed into TAS.

J. Cash Assistance

Base Cash Assistance Matrix

- Cash Assistance amounts will be reviewed and established by the Executive Team and Workforce Development Program Manager annually or as necessary due to any circumstances that affect economic factors in our service area.
- The current amounts for cash assistance will be kept on the Cash Assistance Matrix, and staff will be notified of any changes and updates.

1. Process in TAS for Calculating the monthly check

- a. The first step is to enter the Monthly Report in the Payments tab. The monthly report is entered AFTER [Blues](#) have been received. Enter the date received, the month that you are going to calculate a grant, and the income month, which is the month for the information on the Blues you received.
- b. The next step is to enter the work participation hours in the Timesheets tab. This step does not apply to Child Only grants and may be skipped. If the client did not turn in hours, or had no hours, at least one week will need to be entered for that month. We report hours for every month a family receives a grant. When you add an entry into Timesheets, those hours are attached to the grant they received in that month, not for the month you are about to calculate a grant for. See the Work Participation section in Client Standards for more information.
- c. Workforce Development staff will then enter the countable income (Earned and Unearned) into TAS under Monthly Income, using the month in which the income was received. TAS applies the Earned Income Disregard of \$800 to the adults' gross income. Only one disregard is allowed per family, even if both adults are working. TAS calculation process for Earned Income:
 - i. Earned Income Disregard is subtracted from the countable earned income.
 - ii. 50% of the remaining earned income is deducted from the grant dollar for dollar.
- d. TAS calculation process for Unearned Income – Countable Unearned income in TAS is counted dollar for dollar against the grant.

- e. TAS will apply any over/underpayments to the grant that case managers have entered.
- f. TAS will also apply any sanctions case managers may have entered.
- g. To calculate the grant, go to the TANF Payments tab.
 - i. The Reporting Month/Year is the month and year that the grant will be for. Enter a 4-digit year, because 2-digit years will be mistaken for the actual 2-digit years.
 - ii. The Income Month/Year is the month that income hours affect the current month's grant. Again, enter a 4-digit year.
 - iii. The grant code is the 5-digit code for the federal or state grant that we are charging the expense.
 - iv. The GL code is the 4-digit code for the line item expense, currently 6500 for grants.
 - v. Child Only grants will have a checkbox to check if they are NOT receiving Food Benefits. Child Only families that do not receive Food Benefits will receive a larger grant.
 - vi. Clicking the calculate button will show you what their grant will be and includes adjustments for Income, Over/Underpayments, Sanctions, and Prorating. Check to make sure all applicable reductions and increases are applied.
 - vii. The Distribution Method will tell Fiscal what to do with the check once it is processed. Protective Payee and Direct Deposit are included here for grants. Choose the best method.
 - viii. Route approval is only applicable if the grant is being submitted electronically through TAS. Unless you have been instructed otherwise, see that it says "No" and move on.
 - ix. Click the Add button to apply the grant and open the print screen. Grants will print pages in reverse order. The purchase request should be on top when submitted with the calculation sheet behind it.

2. Minimum Payments

- a. When a monthly grant is determined for an amount \$50 or less the Workforce Development staff should inform the client about their options.
- b. Options:
 - i. Clients with grants less than \$50 due to earned income may either have a check issued or be placed in Transitional Services. (See Transitional Services Section for details.) Clients should be counseled that this counts against their 60-month time limit and it may be advisable to be placed in Transitional Services rather than continuing to use up limited TANF/Cash Assistance months for a small grant. The client has the choice.
 - ii. Payment less than \$50 due to other reasons (i.e., repayment of cash assistance

funds, unearned income) will be issued a check. Clients should be counseled this counts against their 60-month time limit. Workforce Development staff may offer a voluntary closure to the client rather than continuing to use up limited TANF/Cash Assistance months for a small grant. The client makes the ultimate choice. Even if the check is \$0 due to an overpayment, a \$0 grant will be entered into TAS to collect on the overpayment.

- iii. The client may choose to close or suspend their case instead of receiving a smaller grant at any time, and must be given advance notice of the decreased amount. Suspensions may only last one consecutive month.

3. Who May Receive a Grant

- a. In most cash assistance cases, payments will be made to the head of household. The only other option is to make the payment to a Protective Payee.
- b. In the case of a minor head of household, the payments will be made to a Protective Payee.
- c. See Protective Payee section for details.

4. Who May Authorize Payments

All cash assistance payments will be authorized by appropriate Workforce Development staff and approved by the Site Manager and Program Manager.

5. What the Monthly Assistant Checks Are Intended to be Used For

Monthly Checks, also known as "Assistance" (as defined in 45 CFR 286.10), are "Benefits designed to meet a family's ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items etc.)."

6. Delivery of Payment

- a. Grant checks for the following month will be mailed three days before the last working day of the month.
- b. The grant check is mailed to the address on file in TAS or to the Protective Payee.
- c. Grant checks may not be forwarded from one address to another.
- d. Grant checks may be released to someone not on the grant at with documented explicit permission from the Head of Household, case noted in TAS.
- e. Grant checks may be held at the Workforce Development Site for pick up at the discretion of the Workforce Development staff or at the request of the client.
- f. Clients may also have the option of using Direct Deposit or ReliaCard for their monthly grant. Case Managers must use their own discretion as to which clients may use Direct Deposit or ReliaCard; it is not good for cases that tend to open and close throughout the year.

7. Suspending Cash Assistance Payments

- a. Suspension is used to stop payment for temporary periods of time as an alternative to closing cases and then reopening them when payment is to be resumed.

- b. Suspension is different from closure because the client does not have to reapply for assistance to be reinstated.
- c. A suspension can last up to one month. If ineligibility persists longer than 30 days, the case shall be closed and placed in Transition (if eligible).
- d. When reopening from suspension, it is important that all reasons for suspension have been resolved and thoroughly Case Noted in TAS.
- e. Case managers shall clearly document suspension in Case Notes in TAS. The Case Note should contain, at a minimum, the following information: the basis for the decision to suspend, anticipated length of suspension, and necessary actions needed to lift suspension.
- f. Clients in suspension due to income are eligible for Support Services or Emergency Support Service.
- g. Clients in suspension due to income may still receive incentives if the proposal allows for it.
- h. Reasons to suspend a cash assistance case may include:
 - i. Noncooperation with child support.
 - ii. Not complying with a [home visit](#) or other required appointments
 - iii. Question of eligibility
 - iv. Question of fraud
 - v. Question pertaining to income
 - vi. Over income not to exceed 1 consecutive month
 - vii. Unearned income (See 11. Case Closure and Suspension due to Income below.)
- i. When reversing a suspension when an AU's eligibility criteria or compliance are no longer concerns, the grant for the suspended month may be issued for the full amount. If they are suspended for income, the income still counts, and they must wait until the following month.

8. Delaying the Processing of a Cash Assistance Payment

- a. If Work Participation Activity Logs, income verification, and/or [MERs](#) are not submitted by the 5th, no cash assistance check will be generated, and the staff will follow the sanction and notice process.
- b. No grant can be issued until eligibility is verified on the MER, income is verified with documentation (if applicable), and Work Participation Logs are received and entered into TAS (if applicable).
- c. If the monthly documentation due on the 5th is turned in late, then the grant may be processed late. If the documentation is not received for two months in a row, then the case must close. (If it was due on June 5, and not received by July 5, then close.)

9. Terminating Cash Assistance Payments

- a. If general eligibility ceases to exist the case is closed immediately. Proper notification must occur as well as thorough Case Notes in TAS.
- b. If case is closed due to income, the case may remain open until the last day of the month that they are eligible.
- c. Cases who have reached the maximum time limit on TANF/Cash Assistance (60 months) and no hardship exemption has been granted will be closed on the last day of the 60th month.
- d. Cases who fail to comply with state or tribal Child Support will be suspended, and no check shall be issued until client is in compliance. If they fail to comply for 30 days or more, the case shall be closed.
- e. See Case Closure section for more details.

10. Case Closure and Suspension due to Income

- a. A case may be suspended due to income and shall not receive cash assistance, but may receive support services, Emergency Support Services, and incentives for the month they are suspended.
- b. Cases in suspension must continue to report changes of circumstance and continue with their service plan as usual.
- c. Clients in suspension will be considered an active Workforce Development Participant, and still be allowed to attend Activities, Projects, and Events.
- d. The month a case is suspended shall not count towards a client's 60-month time limit.
- e. Suspend using three month logic: the case is suspended two months after income is received. Three-month logic will not change since the month the income was received would only apply to the month the case was suspended.
- f. Clients are still required to turn in their income, work participation, and MER by the 5th to remain in compliance.
- g. Clients will have the option to close their case instead and reopen after the 14-day waiting period if they find they are in need of cash assistance that month. A case that closes at the request of the client due to excessive earned or unearned income will have a two-week waiting period prior to reopening. When the case is reopened, three-month logic will start over, and they must meet prospective income and resource eligibility guidelines.

11. Stopping Payments and Reissuing

- a. The Program will stop payment on cash assistance checks that have been issued but not received by the Client due to theft, damage, or loss.
- b. A police report is not required by Fiscal for stolen checks, but a Case Manager may require one from the client if warranted.
- c. If a client cashes the missing and replacement check, a recoupment plan will be established following the guidelines in the recoupment section.

- d. A check may not be stopped and reissued until at least 5 days after the distribution date of the check.
- e. Checks that have to be replaced will not be reissued for at least 3 days after a stop payment is in place by the Fiscal Department.
- f. The Fiscal Department may request more time or documentation to stop or reissue a payment.
- g. Exceptions may be granted with WFD Program Manager or Fiscal Director approval on a case-by-case basis.

K. Corrective Cash Assistance Payments

1. Underpayments

- a. When an eligible Client receives cash assistance benefits in a smaller amount than eligible, The Program shall include the difference in the next payment.
- b. Case manager shall clearly document underpayments in Case Notes in TAS. The Case Note should contain, at a minimum, the following: the circumstances that created the underpayment, how the amount was calculated, and when it was resolved.
- c. The reason for the underpayment must be printed in the Adjustments Explanation section of the grant calculation sheet. TAS will automatically insert the comments for each month's underpayment to the Adjustments Explanation.
- d. The Client shall be given written notice of the underpayment.

2. Overpayments

- a. The Program does not recoup for other States/Tribes.
- b. When an eligible cash assistance client receives benefits (Cash Assistance, Emergency Support Services, Incentives, or Support Service) in a larger amount than eligible or were not eligible to receive, The Program shall recoup the amount the Client was not eligible for.
- c. When recouping an Emergency Support Service, Support Service, or Incentive the client may not receive any Emergency Support Services or Support Services until the recoupment plan has been established. Tuition for Job Skills Training must be paid in full before more tuition for Job Skills Training may be paid.
- d. Recoupment Process
When an overpayment is discovered, the following actions must be taken:
 - i. The cause must be determined and Case Noted.
 - ii. If the case is open, an overpayment must be Case Noted, TAS over/underpayment set, and appropriate notice mailed to client.
 - iii. If the case is closed the following must occur:
 - iv. The case history must show an overpayment for collection if it reopens in the future in Case Notes in TAS over/underpayment.

- v. An attempt to contact the past client must be made to establish a repayment plan.
 - vi. If fraud is suspected, the Case Manager will follow the fraud process.
 - vii. If no fraud is involved the Workforce Development staff sends a recoupment notice to the client and the grant will be reduced for the months necessary to recover the loss. If the client wishes to appeal the recoupment determination, he/she may file an appeal with the Program Manager.
- e. Calculating the Recoupment
- i. The case manager shall gain approval from the Site Manager of the recoupment plan before applying the amount and length of grant reduction period.
 - ii. The Workforce Development staff will develop a recoupment plan which includes the total amount due SPIPA, amount of monthly repayment, and the repayment period.
 - iii. The Workforce Development staff may withhold up to the entire amount of the assistance check until repayment has been completed.
 - iv. If the amount owed is less than \$25.00, then the entire amount will be recouped in one payment if possible. If more than \$25.00 is owed, then a repayment plan of no less than \$25.00 shall be instated.
 - v. The Workforce Development staff may consult with the client when developing the repayment plan.
 - vi. Hardship – the recoupment process may be suspended or adjusted to less than the \$25 minimum for up to three months during the recoupment period with Site Manager’s approval. Workforce Development staff can suspend only if recoupment poses such a financial threat that the loss of income poses extreme hardship (with documentation) to the family.
- f. Entering Overpayments and Underpayments in TAS
- i. After the recoupment and monthly amounts are determined, enter a Case Note into TAS, Note Type# 503: Over/Under Payment Required Case Note. The note shall include the reason for the Overpayment or Underpayment, the total amount, and the monthly amounts, the first and last months of the recoupment or repayment, and the last month’s amount, if different.
 - ii. Then go to the Over Under Pmts tab in the Payments tab in TANF Intake.
 - iii. In Transaction Type select either Overpayment or Underpayment. If this is a reinstatement of a previous Overpayment from a prior Intake, select Overpayment Reinstated.
 - iv. Select the Effect to TANF Payment. For Overpayments, select Decrease, and for Underpayments, Increase.
 - v. Enter the Starting Year, Starting Month, Number of Months, and Total Amount

next, and click the Add button.

- vi. If it has not opened, open the Over/Underpayment entry in TAS. Each payment will be entered separately.
- vii. In TANF Over and Under Payment Details:
 - 1) Enter the amount for the first month,
 - 2) Enter the number of the month (1 = January, etc.),
 - 3) Enter the 4-digit year,
 - 4) Enter the payment number in Pmt #,
 - 5) Skip Complete and Date Completed, these will fill in automatically,
 - 6) Type the reason for the adjustment in the Comments section, and
 - 7) Click the green cross or hit Enter to add the entry.
- viii. Repeat this for every month of the Over/Underpayment, increasing the month and payment number, and re-entering the Comment which will print on the grant request.

L. Protective Payees

1. General

A protective payee is a person or an employee of an agency who manages client cash benefits to provide for basic needs – housing, utilities, clothing, childcare, and food. They may also provide services such as training clients how to manage money. The primary concern of the protective payee is ensuring the needs of the children are met.

2. Length of Time

- a. Length of time will be dependent upon the reason in which a client is placed on Protect Payee status.
- b. When a Protective Payee is assigned to a case it will last no fewer than three months. At the end of the three months Workforce Development staff will review the need of a Payee to determine if continuation is necessary.

3. When Must a Protective Payee be Established

- a. When a child/adult is under the care/custody of CPS/ICW. This does not apply to non-needy caretakers unless they are under investigation. The protective payee will continue for the time the case is involved with CPS/ICW.
- b. Minor parents must also have their cash assistance benefits paid to a protective payee. Protective payee will continue until they become 18 years of age. This requirement for minor parents may be waived with satisfactory completion of a financial literacy class.
- c. Safety Net grants must be paid to a protective payee. Minimum length of payee will be 6 months.

- d. When an adult (any household composition) has been placed in treatment inpatient, a protective payee will be assigned for a minimum of three months or until successful documented completion of the treatment program.
- e. When the Workforce Development client has reached the second level of sanction, a protective payee will be assigned for a minimum of three months.

4. Other Situations in Which a Protective Payee May be Established.

- a. The head of household may request a protective payee. Requested payees may be taken off at any time.
- b. Workforce Development staff have the right to establish a protective payee when good cause is warranted, and after staffing with Workforce Development Team. Workforce Development staff shall review the need for a protective payee every three months.

5. Who May and May Not be a Protective Payee

- a. A list of contracted protective payees is maintained by The Program Administration.
- b. The following persons **cannot** be appointed as protective payees:
 - i. Any employee or contractor who determines financial eligibility for the family;
 - ii. Any South Puget Intertribal Planning Agency or tribal employee who is responsible for money or bills related to the client(s) family; and
 - iii. Landlords, store owners, or other vendors of goods or services who have a relation to the client(s); and
 - iv. Any active Workforce Development participant or Workforce Development cash assistance client's family.

6. Referral to the Protective Payee

- a. Once the need for a protective payee has been identified, the Workforce Development staff must make the referral to the assigned protective payee.
- b. The Workforce Development staff must identify the priority of bills and other needs the client may need to the protective payee. Bills do not need to be in the client's name if the client is responsible for a portion, but only the client's portion will be paid.
- c. After bills are paid, or if there are no bills to pay, the remainder of the client's grant will be given to the client in two separate installments, once at the beginning of the month, and again two weeks after. If the remaining balance after bills are paid is less than \$100, the entire amount may be given to the client.

7. Staff Procedure

- a. All copies of referrals must be kept in client file and Case Noted in TAS.
- b. Case manager shall clearly document protective payee status in Case Notes in TAS. The Case Note should contain, at a minimum, the following: the circumstances that

created the need for the protective payee, who the protective payee is, the priority of the bills, and the length of the protective payee status if known.

M. Sanctions (Benefit Reduction)

1. General

- a. All cash assistance clients are required to meet the requirements of the program.
- b. The Program is designed to assist families and not cause undue harm. When an adult refuses to participate in the work responsibilities or fails to meet the requirements of the program without good cause, the household will be sanctioned.
- c. Sanctions are intended to encourage cooperation with the program requirements on the part of those individuals who would not cooperate without such sanctions.
- d. When sanctions are applied a reduction in grant amount will result and the household will not be eligible for support services and incentives until the sanction period has been served or good cause is granted. If an incentive is earned during a time of compliance, but would be issued after a sanction, the Workforce Development staff may issue the incentive if warranted. Support services, however, may not be received while in sanction.
- e. Completion of all corrective actions is required before cash assistance can be restored to the original amount, when applicable.
- f. Cash Assistance Clients who close in sanction status without receiving a sanctioned grant must reopen with that sanction or be closed for at least 30 days to reopen without a sanction. Families that reopen after 30 days will not be eligible for support services or incentives for 15 days after the date approved. If a family has been closed for at least one year, the 15-day waiting period may be waived.
- g. A sanction warning notice will be sent to all clients in noncompliance, and they will be given 15 days to either show good cause or correct the noncompliance if possible. Clients may not correct the noncompliance for the same offense for more than one consecutive month. (E.g., if a client is warned for not turning in their Work Participation Activity Logs in June, and turns them in late to avoid sanction in June, they may not turn them in late in July to avoid sanction again.)
- h. It is not possible to receive more than one level of sanction per month, nor more than one of the same level of sanction per month. If there are multiple reasons for the sanction, only one sanction is imposed, but all criteria for lifting the sanction must be met before the sanction can be lifted. It is possible to receive one sanction, at any level 1 – 3, and a School Attendance Sanction in the same month.

2. Reasons a sanction may be issued

Noncompliance with program requirements may include:

- a. Not submitting Work Participation Logs by the 5th of the month,
- b. Not meeting work participation hours (20 hours 1 parent families and 30 hours for two-parent families),

- c. Quitting job or refusal of work without good reason,
- d. Not complying with assigned work activity requirements,
- e. Not complying with assigned completion of high school diploma or its equivalent,
- f. Not complying with Minor HH requirement to attend school,
- g. Not complying with requirement to complete an Individual Service Plan or not complying with its conditions, or
- h. Other as determined and documented by Site Manager.

3. Sanction Process

- a. Prior to imposing a penalty, a client shall receive a Sanction Warning Notice generated out of TAS. Copies shall be maintained in the physical file.
- b. Workforce Development staff shall mail Notice by the tenth of the month for clients who fail to:
 - i. Submit work participation activity log and income by the fifth of the month; or
 - ii. Meet the minimum required work participation hours.
- c. Cash Assistance clients who are out of compliance with any other program requirement shall receive a Sanction Warning Notice as soon as the determination is made by The Program.
- d. Case manager shall clearly document sanction status in Case Notes in TAS. The Case Note shall contain, at a minimum, the following: the circumstances that created the need for the sanction, whether a protective payee has been assigned, sanction level, and actions required to remove sanction.
- e. After the 15-day warning period, if the client has not complied nor provided good cause, the sanction must be set in TAS. When setting a sanction in TAS:
 - i. Use the Friday of or after the noncompliance as the week ending date,
 - ii. Set the next grant as the Sanction Deducted from Reporting Month/Year,
 - iii. Fill out the appropriate person, level, and reason,
 - iv. Set the status to Active and Complied to "No,"
 - v. Leave the Date Complied blank and put Sanction lifted due to good cause as "No," and
 - vi. Set the Sanction Lifted Date to 30 days after the date of the Sanction Warning Letter.

4. Sanction/Penalty Levels

Sanction Levels are as follows:

Sanction Time Schedule

Penalty levels advance over a [rolling calendar year](#), effective from the most recent

penalty level. (e.g., if they received Sanction Level 3 in the last 12 months, they will progress to Sanction Level 4, and if it has been more than 12 months, they will start back and Sanction Level 1.) Penalty levels will also advance regardless of the reason for the Sanction.

a. Warning, no deduction in grant amount

- i. Clients shall receive a Sanction Warning Notice.
- ii. If the client does not comply within 15 days or demonstrate Good Cause, a sanction shall be imposed.
- iii. Complying with a sanction warning requirement will only prevent a sanction for 1 consecutive month for the same requirement. Clients who fail to comply with the same program requirement 2 or more months in a row will receive a sanction and must comply with the requirement(s) to keep their case open.
- iv. Precedes every sanction level and applies to cases in hardship exemption as well.
- v. If the client demonstrates Good Cause, then sanction level will not be imposed.
- vi. Do not enter the sanction in the Sanctions section of TAS until the 15-day warning period is complete and no compliance or good cause has applied.

b. Sanction Level One

- i. Cash Assistance clients receiving Sanction Level 1 will be mailed a notice containing the following:
 - 1) Reason for sanction,
 - 2) Notice of 25% reduction of the next grant,
 - 3) What they need to do to come back into compliance to prevent further sanctions and/or case closure.
- ii. Client will also be given a copy of the Appeal Policy.

c. Sanction Level Two

- i. Cash Assistance clients receiving Sanction Level 2 will be mailed a notice containing the following:
 - 1) Reason for sanction,
 - 2) Notice of 25% reduction of the next grant,
 - 3) Protective Payee assigned, and
 - 4) What they need to do to come back into compliance to prevent further sanctions and/or case closure.
- ii. Client will also be given a copy of the Appeal Policy.

d. Sanction Level Three

- i. Cash Assistance clients receiving Sanction Level 3 will be mailed a notice containing the following:
 - 1) Reason for sanction,
 - 2) Notice of 50% reduction of the next grant
 - 3) Protective Payee assigned for no fewer than 6 months, and
 - 4) What they need to do to come back into compliance to prevent further sanctions and/or case closure.
- ii. Client will also be given a copy of the Appeal Policy.

e. Sanction Level Four – Closure of Case

Cash Assistance clients receiving Sanction Level 4 will be mailed a notice containing the following:

- i. Reason for the sanction,
- ii. Notice of case closure for a period of no fewer than 12 months,
- iii. Client will also be given a copy of the Appeal Policy, and
- iv. Referral to the State TANF program, or
- v. Reopen the case in the Safety Net Program. This status is not automatic but must be approved by the Program Manager.

Sanction Levels	Penalty Applied
Warning (No sanction applied)	No Support Services or Incentives
Level 1 – 25% of Total Grant	No Support Services or Incentives
Level 2 – 25% of Total Grant	No Support Services or Incentives, Protective Payee for 3 Months
Level 3 – 50% of Total Grant	No Support Services or Incentives, Protective Payee for 6 Months
Level 4 – Case Closure	Not eligible for SPIPA Cash Assistance Services for no fewer than 12 months.

f. Safety Net Program

- i. Safety Net Program eligibility will be determined on a case-by-case basis. A Case Manager may recommend the Safety Net Program to the Site Manager who may recommend to the Workforce Development Team for review. The Workforce Development team will forward the recommendation to the Program Manager for final approval.
- ii. Parent(s) may be eligible for the Safety Net Program once in a lifetime. The intent of the Safety Net Program is to provide a protected grant and services only to the children on the grant.
- iii. The SPIPA Workforce Development Program may provide a Child Only grant for up to 6 months to children of families who have been sanctioned off the Workforce Development Program - Cash Assistance Services.
- iv. The parents' income and resources are used to determine eligibility for cash assistance. The same income guidelines will apply as for a 1 or 2-parent grant and be applied to the Safety Net grant amount.
- v. Adults in the Safety Net Program case shall comply with work participation and all other program requirements.
- vi. Should the family close due to noncompliance, the case will close for no less than 12 months. If reopened, the case shall be assigned a Protective Payee for an additional six months.
- vii. Sanction warning notices are still allowed in the Safety Net Program to give clients 15 days to provide Good Cause only, not to comply.
- viii. Families will be assigned a Protective Payee for the duration of the Safety Net Program.
- ix. Adults in the Safety Net Program may not receive direct support services or incentives but may still receive Emergency Support Services.
- x. After six months, the Program Manager shall either reopen the case as a one or two-parent family if the parents are in compliance with The Program or close the case for a period of no less than 12 months. If reopened, the case shall be assigned a Protective Payee for an additional six months.

g. School Attendance Sanction

Failure of parents to send children to school or the failure of children to attend school contrary to applicable **truancy laws and school policy** will result in a school attendance sanction warning and referral to appropriate programs as mandated by law.

- i. Once an attendance problem has been identified, the Client will be given 30 days to correct the attendance problem.
 - 1) During the 30-day corrective period, the family is not eligible for support services and the adults and noncompliant children are not eligible for

incentives. Children who are compliant with attendance may still receive incentives.

- 2) Workforce Development staff shall issue a School Attendance Sanction warning notice.
- ii. If the attendance problem has not been corrected by the end of the 30- day corrective period, the family will be sanctioned for \$125, regardless of the family size, grant amount, or number of children in the home, even if there is only one child.
- 1) Workforce Development staff shall issue a School Attendance Sanction notice and set the sanction level in TAS.
 - 2) A family in sanction due to a child not attending school is not eligible for support services and the adults and noncompliant children are not eligible for incentives. Children who are compliant with attendance may still receive incentives.
 - 3) Families may continue to receive this sanction as long as the child is not attending school and is not subject to case closure.
 - 4) Families may receive other sanction penalties (as described in Sanction/Penalty Levels) in the same month as special noncompliance with school sanction.

5. Reopening a Cash Assistance Case That Closed in Sanction

- a. If a case closes in sanction before the grant can be reduced, then the family must reopen in the same sanction or wait at least 30 days before reopening.
- b. Cases that reopen after being closed for 30 days shall open in a Sanction Warning status and must wait 15 days before receiving support services or incentives and must comply with whatever placed them in the previous sanction, if reasonable.
- c. If a case is closed for 12 months or more, the 15-day warning period may be waived.

6. Length of Sanction

- a. The length of the penalty period is 30 days from the date of the Sanction Warning notice, for each occurrence. If the family comes back into and remains in compliance at the end of the sanction period, the sanction may be lifted. If the family fails to comply with the requirements listed in the Sanction Notice, or otherwise fail to comply, the Sanction may advance to the next level. If there is an issue of eligibility due to the noncompliance, the case will close before advancing to the next Sanction Level.
- b. For examples:
 - i. A client is sanctioned for not handing in work participation logs by the fifth, if the case manager mails the Sanction Warning notice on the 6th of the month, the

- length of sanction will be until the 6th of the following month, unless Good Cause is granted, or the client(s) can and do comply within 15 days.
- ii. A client is sanctioned for not participating in an agreed upon activity from their Individual Service Plan on the fifteenth of the month, the case manager mails the Sanction Warning notice on the 20th, the length of sanction will be until the 20th of the next month, unless Good Cause is granted, or the client(s) can and do comply within 15 days.
 - c. In certain cases, it may be advisable to refrain from calculating a client's next grant check that may or may not be sanctioned. For example, if a Sanction Warning Notice is sent out on the 10th of the month, and grants are due on the 21st, it would be advisable to not calculate the next month's grant until the 15-day sanction warning period is complete, or the client satisfies its requirements and avoids sanction. In cases where the next grant may be unreasonably delayed, it may be advisable to calculate their next grant and sanction the following grant. Case managers must exercise good judgment to not cause an undue burden on the client or unnecessary risk to the program.
 - d. Sanction levels are applied over a Rolling Calendar Year, effective from the most recent sanction level. Therefore, if a case that had a Level 1 sanction gets another sanction within a year, the new sanction would be Level 2, and if they got another one within a year of the Level 2 sanction, the newest sanction would be Level 3 and so on.

7. Good Cause for Noncompliance with the WFD Program - Cash Assistance Service

A sanction may not be imposed if the noncompliance resulted from one of the reasons below, and the Workforce Development staff agrees to grant Good Cause for that reason. The Good Cause reason shall be documented clearly in TAS Case Notes and the sanction shall be reversed.

The following are examples of what may constitute Good Cause. Good Cause is determined on a case-by-case basis, and the situations described below do not automatically constitute Good Cause. The Case Managers must determine if the situation applies:

- a. **Unavailable childcare:** The parent or caretaker relative in a one-parent family cannot find appropriate and available childcare for a child living in their home under six years of age.
- b. **Domestic Violence:** Any situation involving domestic violence that prevented the client from complying or would have put the client or their family at risk of harm.
- c. **Age:** The limited strength and stamina of a client over age 55 prevents them from meeting the requirement.
- d. **Crisis:** A sudden and temporary situation beyond the family's control occurs, and it affects the health of a family member or their ability to comply. This reason includes illness, death in the family.

- e. **Court:** The client must appear in court, serve on a jury, or serve time.
- f. **Transportation:** Necessary transportation breaks down or becomes unavailable, and the client lacks a reasonable alternative.
- g. **Inclement weather:** Weather conditions are hazardous and prohibit travel or compliance.
- h. **Environmental Disasters:** Emergency situations that may prevent the client from participating, such as forest fires, floods, and pandemic situations affecting the area.
- i. **Other:** Other extreme or unusual situations as determined by the Workforce Development Staff.

8. Sanctions from Other TANF/Cash Assistance Programs

Penalties imposed by other TANF/Cash Assistance programs will not transfer to The Program. Penalties will transfer between sites when a case transfers, also when the case closes in one site and opens at another site later.

N. Fraud

1. What is Fraud?

- a. Fraud is an intentional program violation, or misrepresentation or deception deliberately practiced in order to obtain or continue to receive SPIPA Workforce Development Cash Assistance Services or benefits.
- b. All suspicions of fraud shall be referred to the Site Manager immediately.
- c. All allegations of fraud shall be investigated by the Site Manager or his/her designee within a reasonable timeframe. A member of the Workforce Development team may also do the fraud investigation at the request of the Site Manager.
- d. The Workforce Development team will review the fraud findings and the Program Manager will have the final approval of the findings and send notice to the client of the findings and its consequences.

2. Reasons to Suspect Fraud

- a. A collateral contact does not respond with requested information;
- b. The information received from the client or contact is inconsistent, unclear, unconvincing, or questionable;
- c. Verification documents cannot be obtained through normal methods;
- d. The application interview raises questions or concerns about the reported facts.
- e. Examples of situations that may indicate a referral is in order:
 - i. Records of resource ownership are different than the client claims and no verification of the client's claims can be obtained.
 - ii. Client reports living alone, and the landlord statement reflects the same information, but information received shows others are in the home and supporting the client.

- iii. There is currently no source of income being reported for the household and the client does not have a reasonable explanation of how expenses are being met.
- iv. Client states that the non-custodial parent is not in the home but the lease and/or landlord indicate both parents reside in the home.
- v. Client states that certain children are not in the home, but information received indicates otherwise.
- vi. Client reports no income on MER, but you have information that they have been working.
- vii. Client bring in their own copies of certain documents and is not willing to show the originals.

3. Reporting Fraud

- a. When a staff member suspects a client is committing fraud, the staff member shall thoroughly Case Note the incident in TAS and notify the Workforce Development Site Manager in writing.
- b. The staff member shall gather all pertinent documents and information regarding the suspected fraud and forward to the Site Manager for investigation.
- c. If the client refuses to cooperate with large repayments or if the fraud is deemed serious enough, such as identity theft or receiving duplicate TANF/Cash Assistance services, the case may be referred to the applicable tribal court or State fraud investigator.

4. Fraud Investigations

- a. Initiating a Fraud Investigation - The Site Manager may delegate investigation of the incident, or the Workforce Development Team may do the investigation if the Site Manager is unable to.
- b. Notification to cash assistance client - The applicant or client will be notified that a fraud investigation has initiated.
- c. Case Status – The client’s case may be suspended in TAS at the discretion of the Site Manager. The client shall not be eligible to receive Support Services, Emergency Support Services, or incentives during the investigation.
- d. Upon completion of the fraud investigation, a written report shall be completed which details the investigation and findings for final determination.
- e. The following may be utilized in an investigation:
 - i. Physical case file audit
 - ii. ACES audit
 - iii. Inter-program contact
 - iv. Home visit

- v. Meeting with client
- vi. 3rd party verification from a collateral contact from a reliable source
- vii. Any other reasonable method the investigator deems necessary
- f. The Site Manager or his/her designee shall document all findings which shall be maintained in a confidential investigative file.

5. Action

- a. Cash Assistance clients shall be denied services and/or benefits if the Program Manager determines that fraud has been committed.
- b. The penalty levels for fraud are as follows:
 - i. 1st offense – 2 to 6-month cash assistance case closure. The Program Manager shall have discretion as to the length of the penalty based on the severity of the fraud.
 - ii. 2nd offense – 12-month cash assistance case closure.
 - iii. 3rd offense – 24-month cash assistance case closure.
- c. The Program Manager has the discretion to start the penalty at any level or to impose a lifetime ban of benefits based on the severity of the fraud.
- d. A Notice of Fraud Determination shall be sent to client.
- e. When appropriate, a copy of the Notice of Fraud Determination shall be sent to the regional contact for the State of Washington.
- f. The denial of cash assistance services and/or benefits shall take effect on the date of the Notice of Fraud Determination.
- g. If a client fraudulently receives cash assistance services and/or benefits, they will be required to pay back any and all amounts they were ineligible to receive. A repayment plan shall be established.
- h. A determination of fraud may be appealed pursuant to these policies.

O. Cash Assistance Case Transfers

1. Transfer of Case to Another Site

- a. At client's request
 - i. Cash Assistance client may request all transfers, whether to another site or case manager, either verbally or in writing. The case manager must case note all requests in TAS.
 - ii. Both sites must agree to the transfer of the case before the case can be transferred.
 - iii. Upon authorization to transfer, the two sites shall coordinate the transfer.
 - iv. Sites may keep the original file when transferring the case. They may, however, send copies of supporting eligibility documentation to the receiving site.

- b. Employees Receiving Cash Assistance
 - i. Employees who are also receiving SPIPA Workforce Development - Cash Assistance Services may not be in the chain of command at their own site. For instance, a Site Manager's case may need to transfer, but a Case Manager's case may remain at the site if they do not supervise their case's Case Manager.
 - ii. Employees who are also receiving SPIPA Workforce Development - Cash Assistance Services may not have access to their case in the TAS database.
- c. Conflict of Interest
 - i. A staff member may not determine eligibility, serve, oversee, or otherwise be involved in managing the services of an **immediate family member**.
 - ii. Family members of staff may be served at the staff's site of employment if the related staff is not in the chain of command.
 - iii. If the relationship cannot be avoided at that site, the Client's cash assistance case shall be transferred to another site.
- d. The Program Manager shall be notified immediately of the case transfer.
- e. The cash assistance client shall only be eligible for incentives and activities offered at the new site, unless permission is given by the Site Managers of each site.

2. Transfer of a Cash Assistance Case to Another Workforce Development Case Manager or Site

A cash assistance case shall be transferred to another Workforce Development Case Manager or another site when there is a potential or actual conflict of interest. The Site Manager shall make the final decision regarding transfer. Below are some examples of conflicts of interest:

- a. When a Workforce Development staff member is assigned a cash assistance case in which they will be serving an immediate family member.
- b. When a nonprofessional relationship occurs with either a client or volunteer.
- c. When a business relationship exists between a client and staff member.

P. Cash Assistance Case Closure

1. Reasons for Cash Assistance Case Closure Include:

- a. New Employment: Both Adults, Head of Household, or Spouse
- b. Pay Increase / Hourly Increase
- c. Sale of Land
- d. Seasonal: Advance or Loan, Construction, Lease of Equipment/Permit, Construction, or Sale of Personal Property/Permit
- e. Self-Employment: Fireworks, Fishing (Fin Fish, Geoduck, Shellfish, Multiple Sources).

- f. Shareholder Dividends
- g. Marriage: Combined Income or Combined Resources
- h. Sanctioned for Failure to Meet Work Participation Hours or Requirements
- i. Sanctioned for Failure to Meet Program Requirements
- j. Non-compliance with Child Support: DCS, Tribal, or SPIPA
- k. Minor Head of Household Expelled/Suspended from School
- l. Minor Head of Household Failed to Enroll in School
- m. Minor Head of Household Failure to Meet Course Requirements
- n. Minor Head of Household Failure to Turn in Attendance
- o. Minor Head of Household Has No School/Grade Available
- p. Minor Head of Household Not Attending per State/Tribal Law
- q. Minor Head of Household Homeless by Choice or Through No Fault of Their Own
- r. Minor Head of Household Moved Out of Adult Supervising Home
- s. Minor Head of Household Not Living in a Safe Environment
- t. Minor Head of Household Forced to Leave Due to Federal Regulations on Space Requirements in Their Home
- u. Failed to Sign Individual Service Plan
- v. Failed to Participate in Individual Service Plan
- w. Failed to Comply with Active Sanction
- x. Failed to turn in Work Participation, Monthly Eligibility Reports, and/or Income
- y. Incarceration
- z. No Contact for 45 Days or More
 - i. At Least One Adult in a 2-Parent Household Reached 60-month Time Limit
 - ii. Single Parent Reached 60-month Time Limit
 - iii. Lump Sum Child Support Collected
 - iv. Monthly Child Support Payments Exceed Grant Amount
 - v. Other Excess Unearned Income (NOT Child Support)
 - vi. Per Capita Payment
 - vii. Bank Account Over Resource Limit
 - viii. Boats, Property, or Vehicles Value Over Resource Limit
 - ix. Retirement Benefits Available
 - x. Unemployment Benefits Available
 - xi. Youngest Child Age 18 and Not in School

- xii. Youngest Child Age 19
- xiii. Minor Child No Longer in Custody
- xiv. Minor Child Absence Exceeds Allowable Temporary Absence Period
- xv. Minor Child Removed by State/Tribal Protective Services
- xvi. Minor Child Ran Away from Home
- xvii. Minor Child Passed Away
- xviii. Failed to Cooperate with Annual Recertification
- xix. Transferred to Another State or Tribal Assistance Program
- xx. Family Moved Out of Service Area
- xxi. Voluntary Closure (No Reason Given)
- xxii. Head of Household Left the Household
- xxiii. Head of Household Passed Away

1. Steps necessary to close a cash assistance case:

- a. The Case Manager (or delegated staff) may notify the local CSO Office.
- b. The Case Manager (or delegated staff) will complete and send a Child Support Case Closure Notice to appropriate DCS office and SPIPA Child Support Coordinator.
- c. The Case Manager Must Case Note Case Closure in TAS.
- d. To close a case in TAS, the Case Manager must:
 - i. Add the mandatory Case Closed Case Note (505) into TAS;
 - ii. Add a new Closed Case entry;
 - iii. Enter the Date of the Closure, which is typically the last day of the month;
 - iv. Enter the reason for the closure which can be searched in the Locate field;
 - v. Enter their Employment Status;
 - vi. Enter the estimate of their Self-Sufficiency likelihood;
 - vii. Enter whether or not they transferred to another assistance program, and the name of the program if applicable;
 - viii. To print the Child Support Case Closure Notice, click the Display button to open the closed case entry, and click Print; and,
 - ix. If the family is eligible for Transition services, open the Family Intake and change the Next Review Date to a year from their Date of Closure. See the Transitional Services section of this manual for further instructions.
- e. The Case Manager must send timely notice to the Clients of the action taken.

Q. Notices

Timely notice printed from TAS must be sent to clients and documented in Case Notes in TAS. Timely notice is defined as within ten business days. Notice must include reason, date of closure, and appeal process if their grant is affected.

1. Notice of Decision Requirements

Each cash assistance applicant or client must be provided adequate notice of any substantive action taken by this program that affects eligibility and/or monthly assistance to the client.

2. Notices Generated from TAS

- a. Official notices required under these policies shall be generated from TAS under the Notices Section.
- b. Workforce Development staff shall send all Notices of Adverse Action to clients using the last known address.
- c. Workforce Development staff must thoroughly document in TAS / Case Notes the type of notice issued, details, and action.
- d. Workforce Development staff will maintain a copy of letter in the physical file.

3. Written Communications Not Generated from TAS

- a. In some instances, written communications other than Notices in TAS may be sent to a client.
- b. All Program communications shall contain the following:
 - i. Date.
 - ii. Reason for the communication.
 - iii. Sender's name and signature.
- c. Workforce Development staff shall have written communications reviewed by the Site Manager or member of the Workforce Development Team prior to sending out.
- d. Workforce Development staff shall send communications to clients using last known address.
- e. Workforce Development staff shall thoroughly document in TAS Case Notes the details regarding the communication, and paste the content of the communication into the text of the case note.
- f. Workforce Development staff shall maintain a copy of communication in the physical file.
- g. Reminders, flyers, and other mass mailings do not need Site Manager or Workforce Development team approval, to be case noted, nor to have a copy maintained in the file.

R. Monthly Eligibility Reports (MERs)

1. All cash assistance clients are required to submit a MER by the fifth of each month to determine continuing eligibility. If the fifth falls on a weekend or holiday the MERs are due the next business day. The Client shall verify the following information:
 - a. Address
 - b. School Attendance
 - c. Earned Income Verification for adults and youth
 - d. Unearned Income Verification for adults and youth
 - e. Benefits or Services from other programs
 - f. Child Support
 - g. Food Benefits Amount
 - h. Household Composition
 - i. General Eligibility Issues
2. If MERs are submitted late without good cause, case manager will follow Sanction process. If a Client fails to submit a MER, Workforce Development staff shall follow sanction process, and no grant check shall be processed until the MER is received to determine eligibility.
3. Workforce Development staff are required to thoroughly enter all relevant changes and the date the MER was received in TAS Case Notes.

S.Home Visits – Cash Assistance

1. The purpose of a home visit is to verify the residency of the family and that all family members listed on the application are in the home, and no other persons are in the home that are not listed. Home visits may be conducted when residency and household composition are in question.
 - a. The Case Manager will contact the Client to arrange a mutually convenient time for the visit. The client may reschedule, but the home visit will be within 6 weeks or the next grant check will not be released until it is completed, or the requirement is waived and documented.
 - b. A Client that sets up a meeting and fails to be present for the meeting without good cause may be subject to a noncompliance penalty. A sanction warning will be sent to the client and they must comply within 15 days to avoid sanction and will not receive their next grant check until the home visit is completed or waived.
 - c. If a home visit is delayed or waived, the reason must be thoroughly case noted in TAS. Reasons to delay or refrain from a Home Visit may include:
 - i. Case Manager does not feel safe doing a home visit to the location. This can be due to the location of the home or how much the client is trusted.

- ii. The Client does not feel safe in a home visit for good reasons. If a client is not comfortable with a person, they are unfamiliar with in their home, the home visit may be delayed until they are more comfortable with the case manager. The home visit requirement may also be waived if the client will never be comfortable with a case manager in their home, such as those with PTSD or who have had domestic violence situations.
- iii. The home is not within reasonable distance to the office. For example, if the client lives within the SPIPA service area, but the travel time to the client's home exceeds one half hour, that may not be a reasonable amount of time for a case manager to spend on one home visit.
- d. Workforce Development staff conducting Home Visit will document visit in TAS Case Notes thoroughly.

3 – Client Standards for Cash Assistance

A. Client Responsibilities

1. Client's Responsibilities

- a. To submit all required paperwork to their case manager including:
 - i. Monthly Eligibility Reports (MERs) by the fifth of the month.
 - ii. Monthly Work Participation Activity Logs (if required) by the fifth of each month
 - iii. Income documentation
- b. Notify SPIPA's partner agencies such as DSHS and DCS of all applicable changes reported to The Program. Case managers should remind Clients of their responsibility to notify DSHS and DCS.

B. Work Participation

1. General

- a. All non-exempt/disregarded adults and minor head-of-households are required to do work activities; 20 hours per week for 1-parent families, and 30 hours per week for 2-parent families. The 30-hour work requirement for 2-parent families is the total for the family, not per individual, and they may share the hours and any ratio. If a parent is assigned a work activity, they must do the assigned amount of hours to remain in compliance, even if their spouse completed all required hours.
- b. Each week ends on a Friday, and the number of Fridays in a month determine how many weeks of participation are required for that month. A 1-parent family will need 80 total hours per month with four Fridays and 100 hours per month with five Fridays. A 2-parent family will need 120 hours per month with four Fridays, and 150 hours per month with five Fridays.
- c. Hours per week are averaged across the entire month. A family that did not meet the participation requirement one week can make up lost hours in another week in the same month to meet the average minimum work participation requirement.

- d. Minor head-of-households who do not have a high school diploma or its equivalent will be required to attend school as their work participation.
- e. Clients must submit Work Participation Logs by the fifth of each month, or they shall be subject to penalty unless good cause exists.
- f. When a Client is not meeting the minimum number of work participation hours required, they are noncompliant. The Workforce Development staff shall follow the sanction process.
- g. If a Client has Job Search as a Work Activity they must submit the Job Search Log or those hours will not be counted, and Workforce Development staff shall follow the Sanction Process.

2. Assignment to Work Activities

- a. After making an initial assessment of their employability, the Workforce Development staff shall assign work activities to the Client.
- b. Clients without a high school diploma or its equivalent who are under 50 years of age shall be required to attend High School courses, GED, or Adult Basic Education (ABE) classes, but it should not be their only activity.
- c. Minor head of households will have education assigned as an activity, no exception unless diploma or GED has been obtained.
- d. In some cases, there may be work activities that are not reflected on the ISP.

3. Categories of Countable Work Activities include, But Are Not Limited to:

- a. Workforce Development Activities. These shall be prioritized when assigning work activities to clients.
 - i. Work Experience (WEX)
 - ii. Subsidized Tribal Employment
 - iii. Subsidized Work in the private sector
 - iv. Job Search / Job Readiness
 - v. Unsubsidized Tribal employment
 - vi. Unsubsidized work in the private sector
 - vii. Unsubsidized employment
 - viii. On the Job Training (OJT)
 - ix. Traditional self-employment such as fishing, gathering, and cultural art
 - x. Vocational Education
 - xi. Job Skills Education
 - xii. GED completion
 - xiii. High school course work (for recipients under 20 years of age)

- b. These are acceptable work activities that may be assigned after prioritizing Workforce Development activities.
 - i. Providing approved childcare for other Program Clients engaged in work search activities as approved by the Workforce Development staff
 - ii. Approved Volunteer activities.
 - iii. Reasonable transportation time
 - iv. Traditional subsistence gathering
 - v. Community service such as providing primary care to a disabled child or adult
 - vi. Other Work Activities as defined by Case Manager

4. Guidelines for Countable Time Per Work Activity

- a. The ISP places limits to the minimum and maximum allowed hours for each work activity.
- b. Work Search: Client must submit Work Search Job Log with a minimum of three work searches a week for time to count. Federal time limit is **6 weeks in any calendar year (12 weeks if residing on a reservation with 50% or more unemployment)**.
- c. Traditional Self Employment/Subsistence hunting/fishing/gathering: The Client must sign a declaration stating the activity, location and actual hours spent.
- d. Self-Employment: For self-employment, reported work hours shall reasonably compare with reported gross earned income or product produced. Clients are required to provide documentation of the items produced.
- e. Other Activities: For activities delivered by a partner agency, Clients must provide verification of attendance monthly.

5. Exemptions from the Minimum Work Participation Requirement

- a. An adult on the grant may be exempt or disregarded from the requirement to participate in work activities.
- b. It is better that a client meets the work participation requirement than be exempt. It is also better that a client does some required work activities to advance in their plan while they are exempt from the minimum requirement.
- c. Workforce Development staff will clearly Case Note in TAS why the exemption exists and length of time for exemption.
- d. An adult Client may be exempt from the requirement to participate in work activities for the following reasons:
 - i. Newborn child: A single parent with one or more children under the age of one year; or 2-parent adults with a child under 6 months old.
 - ii. Sanction: Though they are still required to participate, those in Sanction will be disregarded from the Work Participation Rate due to their Sanction status.

- iii. Child Only: Adults in a Child Only case are disregarded from the Work Participation Rate, although those who are in a Safety Net grant may still be required to participate.
- iv. Pregnant woman in her third trimester or high-risk pregnancy: A physician or other licensed medical professional must document this exemption.
- v. Caretaker of disabled child: This is a parent who is providing home care for a child who has a documented disability. A physician or other licensed medical professional must document this exemption.
- vi. Caretaker of disabled adult. This is an adult who is providing home care to a related disabled person requiring 24-hour care. A physician or other licensed medical professional must document this exemption.
- vii. Transportation difficulties in the rural areas on a case-by-case basis: This must be documented and approved by the Program Manager.
- viii. Documented physical or mental disability.
- ix. Childcare unavailable for child under age 6 in a 1-parent family.
- x. Persons over the age of 55.
- xi. [Appropriate childcare](#) is unavailable until arrangements can be made. This applies when a single custodial parent with a dependent child under six years of age who is living in their home demonstrates that suitable childcare has been sought but is unavailable
- xii. Mental or physical health issues (with time limits for approved counseling or treatment).
- xiii. Inpatient substance abuse rehabilitation.
- xiv. Schedule conflicts with required court appearances or incarceration (with time limits and adequate progress towards resolution).
- xv. Extraordinary temporary family circumstances that constitutes unreasonable hardship or risk.
- xvi. Environmental emergencies, such as fire, flood, violent storm, earthquake, or tsunami.
- xvii. Client does not understand ISP requirements (one time only).
- xviii. Special circumstances: This may apply with a death in the family, domestic violence, or court action, etc. Supporting documentation is required and time limits will be determined on a case-by-case basis.

6. Determining Hours of Participation

- a. Clients are required to return Work Activity Logs to Workforce Development staff by the fifth of the month. If the fifth falls on a weekend or holiday, the Work Activity Logs are due the next business day. If the Work Activity Logs are not submitted by the fifth, the Workforce Development staff will follow the sanction process.

- b. Work Activity Logs are required by all adults and minor HH receiving assistance, unless exempted.
- c. Workforce Development staff shall include the allowed time the Client spent commuting between home and work activities.
- d. In the first month, only the weeks since the family has been approved and active will count for work participation. Therefore, if the adult clients are meeting the hours with allowable work activities from the beginning, they may be coded as meeting the hours in their first month.
- e. Workforce Development staff shall include out-of-class study time to the Client's actual hours of participation. To give a Client's study time credit the Client and Workforce Development staff must agree to the estimated average number of hours and they must be documented. For every hour of class time, one hour of study time will be allowed.
- f. Schools that offer basic education and high school completion typically follow State regulated school holidays and have short breaks lasting less than three calendar weeks. Workforce Development staff shall include breaks (other than summer vacation) and holidays as days of participation for activities that include education. This includes colleges and GED and ABE classes on such schedules. Only the typical time they would have spent in class is allowed to be counted.
- g. When a client fails to meet the minimum required work participation, Workforce Development Staff may discuss with the client any activities they did during that month that might be countable as work activities. Activities that are not on the ISP, may be added to the ISP to be counted. Client must sign the ISP for the hours to be effective. Examples may include unexpected legal or medical issues that required the client's time.

7. Work Participation Status:

Work Participation Status (WPS) refers to the numerical code which describes the client's compliancy status as it relates to required work participation hours. Every household required to do hours will need to have their hours and status entered for every month they receive a grant, even if they had zero hours. When a case closes without turning in hours for their final month, at least one week must be entered into TAS and coded WPS 14: Required to participate, but not participating; and not sanctioned for the reporting month. **It is imperative to code all adults in the same household the same WPS code.** Hours are averaged across the entire month. Families may meet the participation requirement one week, and not the next, but every week will be coded based on the entire month's average hours per week.

- a. One/Two-Parent and Needy Caretaker. When adults are on the grant, use the following codes in the following situations.
 - i. Compliant with hours. Code everyone making their hours WPS 19.
 - 1) WPS 19: "Required to participate and meeting minimum participation

requirements." Use this code whenever possible. Even if the client has been sanctioned or would be otherwise disregarded or exempt from work participation. WPS 19 is always preferable if applicable.

ii. Disregarded

- 1) WPS 1: "Disregarded from participation rate, family with child under 12 months." Use this for families with a newborn child; for one-parent families, up to twelve months, and for two-parent families, up to six months.
- 2) WPS 2: "Disregarded from participation rate because all of the following apply: required to participate, but not participating; and sanctioned for the reporting month, but not sanctioned for more than 3 months within the preceding 12-month period (Note, this code should be used only in a month for which the family is disregarded from the participation rate). While one or more adults may be sanctioned in more than 3 months within the preceding 12-month period, the family may not be disregarded from the participation rate for more than 3 months within the preceding 12-month period." If the client is being sanctioned for this month and has fewer than 4 sanctions within the past year, including the current sanction. If this is their 4th sanction within 12 months, use WPS 12.
- 3) WPS 5: "Exempt for reasons specified in negotiated Tribal TANF plan (Workforce Development/477 Plan)." Use this code for environmental emergencies such as flood, fire, storm, tsunami, earthquake, and pandemic or epidemic disease outbreak.

iii. Exempt

- 1) WPS 6: "Exempt, single custodial parent with child under age 6 and childcare unavailable." May only be used until childcare becomes available within a [reasonable distance from the client](#).
- 2) WPS 7: "Exempt, disabled." Client must have doctor's note describing the nature, limitations, and duration of the disability status. The Client Medical Documentation form contains all of the information needed to approve this exemption and is recommended.
- 3) WPS 8: "Exempt, caring for a severely disabled child." Must have documentation of the disability provided by the primary physician or specialist.
- 4) WPS 9: "Exempt, under a federally recognized good cause domestic violence waiver." Domestic violence situation must be documented, and case noted, and Private Case Notes may be used to protect the client. The Good Cause Exemption for Domestic Violence for Child Support will suffice as documentation.
- 5) WPS 11: "Exempt, other." If the client presents good cause for not participating and the Site Manager approves, they may be coded WPS 11 for the month.

iv. Noncompliant

- 1) WPS 12: "Required to participate, but not participating; sanctioned for the reporting month; and sanctioned for more than 3 months within the preceding 12-month period." Use this code when a client receives their 4th sanction within 12 months. Please note that they may be receiving their level 4 sanction, but not receiving all levels in the past 12 months. Use WPS 2 whenever applicable.
- 2) WPS 13: "Required to participate, but not participating; and sanctioned for the reporting month, but not sanctioned for more than 3 months within the preceding 12-month period." Do not use this code. It is identical to WPS 2, which will disregard the household from the Work Participation Rate.
- 3) WPS 14: "Required to participate, but not participating; and not sanctioned for the reporting month." Use this for households that had zero hours, were not exempt, and are not being sanctioned for it. This is usually applicable to the months that household open or close their case.
- 4) WPS 18: "Required to participate and participating, but not meeting minimum participation requirements." Use this for households that had hours, but did not meet the minimum requirement, were not exempt, and are not being sanctioned for it. This is usually applicable to the months that household open or close their case.

b. Minor Head of Household.

- i. Use codes from One/Two-Parent and Needy Caretaker households, unless the minor parent is attending school, but the school is on a mid-schoolyear break. Then use:
 - 1) WPS 15: "*Deemed engaged in work--single teen head-of-household or married teen who maintains satisfactory school attendance.*" Use this code when the minor parent did not meet the minimum hours, but is still enrolled in school and it is still within the regular school year. This is not applicable to breaks between school years, such as summer break.
 - 2) WPS 16: "*Deemed engaged in work--single teen head-of-household or married teen who participates in education directly related to employment for an average of at least 20 hours per week during the reporting month.*" Use this code when the minor parent did not meet the minimum hours, is not enrolled in school, but is enrolled in **vocational** education, but it is on a mid-season break. This is not applicable to breaks between vocational school years, such as summer break.

c. Child Only

- i. WPS 99: "*Not applicable.*" This code is only used for adults on Child Only cases and for adults not on the grant but are in the household. You do not enter hours and weeks for these clients but set their WPS code in the TANF Adults entry within the household's family intake.

8. Work Participation and Noncompliance

- a. Workforce Development staff shall enter Work Participation hours by the tenth of each month.
- b. For those who are not in compliance, sanction warning notices shall be mailed out by the tenth of each month.
- c. Workforce Development staff may prevent the sanction from taking effect if the client demonstrates good cause or complies with the sanction warning's requirements.
- d. If a change in the client's circumstances cause them to not comply with the ISP, the Workforce Development staff may update the ISP with the client and address any current issues. The updated ISP may include hours regarding the client's circumstances to take effect retroactively and bring them into compliance.

9. Noncompliance

- a. If the Work Activity Logs or MERs are not submitted by the fifth, the Workforce Development staff shall follow the sanction process and no cash assistance check will be generated until both are received.
- b. Unless good cause exists, submitting logs late will not be sufficient to bring a Client into compliance for more than one month in a row. Compliance will be regained when the next Work Participation Logs are submitted on time.
- c. Clients not meeting the minimum work participation hours will also be in noncompliance. The Workforce Development staff will follow the sanction process.
- d. If a Client has Job Search as a Work Activity, they must submit the Job Search Log or those hours will not be counted and Workforce Development staff shall follow the Sanction Process.
- e. When a Client is not meeting the attendance and performance requirements, the Workforce Development staff may attempt to reconcile the noncompliance after the sanction process has begun. The ISP should be reviewed to make sure that the hours required are reasonable, and to see if there is any exemption criteria that may prevent them from meeting the minimum requirement.

4 – Client Services for Cash Assistance

A. Emergency Support Services for Cash Assistance Clients

1. Rationale for Emergency Support Services

- a. A family experiences a need for assistance, and does not have the ability to remedy it, they may request an Emergency Support Service. Emergency Support Services are not attached the ISP or related to any work activity, they are designed to ensure the health and safety of the family.
- b. According to 45 CFR Section 286.10 and the SPIPA [TFAP and WFD/477 Plan](#): Nonrecurring Short-Term Benefits (NRSTB) or Emergency Support Services are:

- i. Designed to deal with a specific crisis situation or episode of need; and
 - ii. Not intended to meet recurrent or ongoing needs; and
 - iii. Not to extend beyond four months.
- c. Specified Emergency Support Service limit is dependent upon the Program budget availability.
 - d. Clients are not automatically entitled to Emergency Support Services. Each request shall be examined to determine if the Client has a need for the service.

2. Requesting Emergency Support Services

- a. Any Client has the right to apply for Emergency Support Services.
- b. Clients shall complete and submit an Emergency Support Service Request packet that clearly documents the specific crisis situation which created the need. This must include the specific crisis situation that caused them to not have the funds to pay for it themselves as well as why they need it.
- c. It shall include which other resources the Client utilized.
- d. The crisis shall be clearly documented. Types of required documentation are detailed in the Specific Policies for Emergency Support Service section below.
- e. Case Manager and Site Manager shall ensure request packet is complete prior to submitting for processing.
- f. Case Manager shall clearly document request in Case Notes in TAS.
- g. Emergency Support Service Request Forms received during business hours shall be processed within five business days.
- h. The term "lifetime" refers to the total amount of time a Client receives benefits, not individual periods (instances, cases, or intakes) of cash assistance service.
- i. Emergency Support Service expenditures shall be reasonable and necessary. No luxury items shall be purchased by the Program.
- j. If clients request Emergency Support Services too often, they may be placed in Protective Payee.

3. Who Is Eligible for Emergency Support Services?

- a. 1 or 2-parent families
- b. Child Only Families when a child Client is the direct beneficiary of the Emergency Support Service.
- c. Clients who are in Transitional or Diversion Status.

4. Who Is NOT Eligible for Emergency Support Services?

- a. Non-Workforce Development Clients and
- b. Child Only Families when a child client is not the direct beneficiary of the Emergency Support Service.

5. How are Emergency Support Services paid?

- a. Whenever possible, and there is only one vendor for the service, staff will request a purchase order or check to the vendor.
- b. Funds may be added to a client's ReliaCard if the vendor will not accept a check or purchase order, or if the request is to more than one vendor. Receipts will be required for all services paid to ReliaCard.

6. Recoupment of Emergency Support Service

- a. Emergency Support Service shall be recouped from the Client's grant when:
 - i. The [purchase order](#) is not used for its intended purpose, and or
 - ii. The vendor approves more to be purchased than allowed on the original PO.
- b. Recoupment
 - i. The Program Standards – Corrective Payment is the applicable section on recoupment.
 - ii. No other Emergency Support Service or Support Services are allowable until a repayment plan has been established in TAS and clearly Case Noted.
- c. Staff Requirements
 - i. The recoupment shall be calculated by the case manager and the Site Manager shall be informed of the amount and length of grant reduction period.
 - ii. The recoupment plan shall include: the total amount owed to SPIPA, the monthly repayment amount, and the repayment terms.
 - iii. Once recoupment plan is developed, it shall be immediately entered into TAS and a notice shall be issued to the Client.
 - iv. Workforce Development staff shall enter the information in TAS in the Over and Underpayments Section.
 - v. Workforce Development staff shall document in TAS Case Notes: the reasons for the overpayment, the payment plan, and any other information related to the overpayment.

B. Support Services

1. Support Services

- a. Any Client has the right to apply for Support Services but they are contingent on the following:
 - i. Services must be directly related to an approved activity in the ISP, or employment opportunity; and
 - ii. Support Services are contingent on the availability of funds.
 - iii. All of the above shall be clearly documented in TAS using the appropriate Standardized Case Note template.
- b. Support service payments are not automatic or an entitlement. Each request shall be reviewed for:

- i. Client budget constraints;
 - ii. Recurrence of need; and
 - iii. Other available resources.
- c. Clients shall complete and submit a Support Service Request Packet that clearly documents the need. It shall include which other resources the Client utilized.
 - d. Case Manager and Site Manager shall ensure request packet is complete prior to submitting for final processing.
 - e. Support Services Request Forms shall be processed within ten business days of the receipt of the form and all necessary backup documentation.
 - f. The term "lifetime" refers to the total amount of time a Client receives benefits, not individual periods (instances, cases, or intakes) of cash assistance service.
 - g. Support Service expenditures shall be reasonable and necessary. No luxury items shall be purchased by the Program.
 - h. Support Service checks will not be issued to the client, only to the vendor providing the service.
 - i. Exceptions to the amount limits in policy may be requested for the client unless policy states otherwise. The Case Manager shall document the reason for the exception, and the Site Manager shall approve or deny and forward to the Program Manager for the final decision.
 - j. Some Support Services may be paid for by adding funds to the client's ReliaCard, but only if payment made directly to the vendor is not reasonable. Support Services made on ReliaCard will require receipts or the amounts must be recouped.

2. Who Is Eligible for Support Services?

- a. Current 1 or 2-parent Cash Assistance families;
- b. Caretaker/relatives when the support service directly benefits the child receiving assistance; or
- c. Clients in Diversion or Transition status.
- d. Clients must be in full compliance with all program requirements in order to be eligible for Support Services.

3. Who Is Not Eligible for Support Services?

- a. Clients who are not in compliance;
- b. Clients whose request is not directly related to their ISP, a work activity, or employment; and
- c. Non-Workforce Development clients.

4. Requesting Support Services

- a. Clients shall submit a completed Support Service Request, which clearly demonstrates how the request links to the Individual Service Plan, an approved

activity, or employment opportunity.

- b. Workforce Development is the payer of last resort, not a primary resource, and it is necessary to document other resources utilized.
- c. Case Manager shall submit the completed request through SPIPA check-processing procedures.
- d. Case Manager shall clearly document request in TAS Case Notes.

5. Recoupment of Support Services

- a. The cost of a Support Service shall be recouped from the Client's grant when:
 - i. The purchase order is not used for its intended purpose;
 - ii. The amount spent exceeds the original PO;
 - iii. The Client was ineligible to receive the support service they received.
 - iv. The Client fails, without good cause, to complete Job Skills training that SPIPA paid for, and they have agreed to participate in. A repayment plan shall be developed. No other Job Skills training shall be authorized until six months of successful repayment installments have been made; or
 - v. The Client has received a computer from the Program and he/she fails to complete Job Skills training without good cause. No other Job Skills training shall be authorized until the Program has received a payment.
 - vi. Any other reason determined by the Program Manager.
- b. Recoupment
 - i. The Program Standards – "Corrective Payment Process" is the applicable section on recoupment.
 - ii. No other Support Services are allowable until a repayment plan has been established in TAS and clearly Case Noted.
- c. Staff Requirements
 - i. The recoupment and the amount & length of grant reduction period shall be calculated the Workforce Development Staff and the Site Manager shall be notified of each recoupment plan.
 - ii. The recoupment plan shall include: the total amount owed to SPIPA, the monthly repayment amount, and the repayment terms.
 - iii. Once recoupment plan is developed, it shall be immediately entered into TAS and a notice shall be issued to the Client.
 - iv. Workforce Development staff shall enter the information in TAS in the "Over and Underpayments" Section.
 - v. Workforce Development staff shall document in TAS Case Notes: the reasons for the overpayment, the payment plan, and any other information related to the overpayment.

C. Transitional Support Services

Transitional Support Services are offered to families who closed their case assistance case with earned income, remain in compliance with program policies, and remain otherwise eligible for services. The purpose of Transitional Services is to keep the family employed and from losing their job and needing to re-apply for cash assistance services.

1. Eligibility for Transitional Services

- a. Clients that close due to earned income or voluntarily close on account of earned income are eligible.
- b. Clients' cases that close due to unearned income alone do not qualify for Transitional Services.
- c. Clients' cases that close due to a combination of unearned and earned income may be considered for Transitional Services.

2. Requirements for Transitional Services

- a. The Case Manager may authorize Transitional Services for up to twenty-four months following case closure.
- b. Once in Transitional Status the Client shall continue to meet the following Cash Assistance Service eligibility factors – residency, child in home, qualified native in the home, and continued employment.
- c. The Client shall also continue to turn in income and hours quarterly to continue receiving services for the first year, and every 6 months after. The Client shall also notify their Case Manager if there is any change in employment status, such as a promotion, demotion, change in hours, change in pay, change in job.
- d. If the Client loses employment due to circumstances beyond their control, and finds new employment within two weeks, they may remain in Transition. The circumstances that caused their loss of employment must be documented and approved by the program manager. Such reasons may include, but are not limited to:
 - i. Employer business closed,
 - ii. Employer business relocated,
 - iii. Employee laid off, and
 - iv. Employee quit with good cause approved by site manager.
- a. If a Client's cash assistance case closes due to earned income, however, is not in compliance with the service standards or they fail to maintain compliance during Transition, they are not eligible for Transitional Services until they return to compliance with service requirements. (E.g., if they fail to turn in their hours or income their last month, they may be eligible upon receipt of missing documents).
- b. To place a client in Transitional Services, first close the cash assistance case according to the steps laid out in the Case Closures section.

- c. Case Managers must enter all income and employment information into TAS when turned in.
- d. Site Managers must update the Family's Next Review Date in the TANF Family Intake in TAS to one year from the date of their closure, and review them for continued eligibility at that date, then extend the Next Review Date for an additional year if the family remains eligible.
- e. Add their employment information to the client's Work History, and case note the details of their employment in the Case Closed Required Case Note, including the employer, date of hire, current wages, and date Transitional Services started.

3. Types of Transitional Services That May Be Offered

- a. Case manager may provide any allowable Support Service or Emergency Support Services that assists the Client in maintaining their employment defined in the Support Service Section of this Manual.
- b. Clients in Transitional Status may receive Program Incentives if they are part of the demographic described in its proposal and meet its eligibility criteria.
- c. Specific documentation and dollar limits are defined in Client Services are applicable to Transitional Services.
- d. Case Manager shall include in Case Note how this service assists the family in self-sufficiency.

D. Project Proposals

1. Sites may do activities, projects, and events (Projects) that meet at least one of the four purposes of TANF/Cash Assistance. Types of projects may include incentives for meeting service requirements, classes or events that promote self-sufficiency (GED, Job Readiness, etc.), and Youth Employment programs.
2. Some things allowed in policy require a Proposal to be in place, such as incentives.
3. The Activity/Project/Event Proposal Form shall be completed by the site, reviewed by the Workforce Development team, and approved by the Program Manager before implementing and before any funds are spent. The most current forms must be used and should be turned in for approval three weeks before the project begins to allow for enough time for review and possible modifications.
4. All Projects must be entered into TAS before implementation. Most Projects shall be entered into the Projects module of TAS. When the only expense from a Project is the incentives, the Project may be entered only in the Benefits Module of TAS; an approved proposal is still required.
5. The Workforce Development Team will keep copies of all proposals at their office and scanned copies on the network.
6. All payments for Projects must originate in TAS.
 - a. Incentives for clients will originate in the Benefits Module.

- b. All other expenses will originate from the Projects Module.
 - c. The purchases must be separated by the budget categories listed above. For instance, Consumable Supplies and Project Supplies must be on separate transactions. A description of the purchase must also be present in the Transaction Description. E.g., Consumable Supplies: Lunch for participants; and, Project Supplies: Beads, Containers.
 - d. A copy of the purchase requisition will be kept with copy of the proposal with the Workforce Development Team.
7. Project Proposals may be amended if there are unexpected expenses or modifications to the Project itself. The amendment form must be filled out and approved by the Site Manager and the Program Manager. The approval shall be kept with the original Proposal and a copy with the Workforce Development Team's copy of the proposal.

E. Performance Incentives

1. Incentives required a written project proposal approved by the Program Manager with established goals.
 - a. All projects shall be input into TAS.
 - b. Miscellaneous incentives may be offered at the discretion of the Program Manager as long as funds are available, and families are in compliance with service and program requirements.
 - c. Incentives may include, but are not limited to, food, clothing, types of assistance, educational activities, and purchase orders for such.
 - d. All incentives must be processed using the appropriate incentive form for the project.
 - e. Unallowable incentives include entertainment, unrestricted gift or cash/check cards, and purchase orders that do not limit what a client may purchase.
 - f. All clients receiving incentives must be in compliance with service and program requirements in order to earn an incentive. If an incentive is earned in compliance, it may be issued to a client who becomes out of compliance during processing.
 - g. In order to prevent a conflict of interest, staff members who are also Cash Assistance Workforce Development Program clients may not process nor approve any incentives they may be eligible to receive.
2. Recurring incentives that may be offered to clients without a project proposal are:
 - a. Holiday Food. Given at Thanksgiving and/or Christmas for compliance with program policies and requirements.
 - i. This incentive has a maximum of \$125 and can be added to client's ReliaCard or can include any combination of food and preparation items as well as purchase orders for food and food preparation items.
 - ii. Clients shall have their Annual Recertification up to date and shall be in compliance in order to receive. This will meet Purpose 1 of TANF by ensuring

- that all clients continue annual cash assistance eligibility.
- iii. The incentive form shall be completed verifying that the client is in compliance, earned the incentive, and it was documented in TAS case notes.
- b. Client Assistance & Responsibility or Monthly Check-in.
- i. Consumables up to \$15/participant.
 - ii. Up to \$100 can be added to client's ReliaCard, or can consist of purchase orders for household and hygiene products.
 - iii. Participants must turn in all required documentation and be in compliance with cash assistance service requirements to receive the incentive.
 - iv. This meets Purpose 1 of TANF by ensuring that clients meet monthly eligibility requirements in order to continue receiving services.

5 – Staff Standards for Cash Assistance

A. Change of Household Composition (Action to Take)

If an adult or child enters or leaves the AU, assuming eligibility exists:

- 1. Workforce Development staff shall inform the client to notify the CSO and other service providers of the changes as it may affect other benefits. Workforce Development staff may also inform the CSO and other partners of the changes if needed.**
- 2. The Case Manager (or delegated staff) will complete and send DCS Change Notice to appropriate DCS office and SPIPA Child Support Coordinator.**
- 3. The Case Manager Must Case Note change of household in TAS.**
- 4. Caretaker Changes in a Child Only Case**
 - a. If the caretaker relative changes, the existing case must be closed, and the new caretaker relative may apply.
 - b. If a caretaker relative leaves the home and a new caretaker relative applies for benefits on behalf of the children, no duplication of payments can occur. A stop payment can be ordered on the existing check and it can be replaced by a new check issued to the new family and adjusted in amount if required by the new circumstances.
 - c. The first-day, first-pay principle applies. However, if the original caretaker relative was in the home one day of the last benefit month, he/she is entitled to receive and cash that month's check and no additional cash benefits can be provided for that month. Timely and adequate notice provisions apply as well.
 - d. Case managers will notify DCS of all changes.
- 5. Child Enters the AU.**
 - a. Adding a child to the AU is not automatic. The client must add the child using an application form along with the new child's eligibility documentation. All factors of eligibility must be met and verified before the child can be added to the case.
 - b. The grant amount will increase as of the next regular payment.
 - c. A prorated payment will be added to the next month's assistance check as an underpayment from the previous month for the additional member. Workforce Development staff must verify the additional child has not received services from another State or Tribal Assistance Program.
 - d. Support services can be provided for the additional household member as of the date of eligibility as long as they are unduplicated, (not already provided in that month by The Program or another federal Workforce Development program.)
 - e. Case managers will notify DCS of all changes.

6. Adult enters AU.

- a. An adult can only be added by a request of the recipient on an application form along with the new adult's eligibility documentation. All factors of eligibility must be met and verified before the adult can be added to the case.
- b. Support services can be provided for the additional household member as of the date of eligibility as long as they are unduplicated, (not already provided in that month by another federal Workforce Development program or SPIPA Intertribal Workforce Development Program Site.)
- c. Case managers will notify DCS of all changes.
- d. In the case when there is an addition of new members to the Workforce Development AU adult will be added to the next payment. The grant will increase the following month. No supplemental payment.
- e. A prorated payment will be added to the next month's assistance check as an underpayment from the previous month for the additional member. Workforce Development staff must verify the additional adult has not received services from another State or Tribal Assistance Program.
- f. Workforce Development staff must counsel the additional adult they are responsible for Work Participation Hours beginning that month forward.

7. Adult or Child Leave the AU

- a. When an adult or child departs from a unit, the head of household/parent/caretaker must notify the Case Manager within ten days. The adult or child is removed from the grant for the first full month adult or child is gone.
- b. The adult's income and hours, if any, are not counted for the month in which they were removed from the home.
- c. Eligibility for services ceases for an individual the day that they leave the home permanently.
- d. If the notice is timely, but the payment for the next month has been issued, the Case Manager will notify the Client of an overpayment situation and follow overpayment procedures.
- e. Case managers will notify DCS of all changes.

8. Child's Age Changes

- a. It is the Case Manager's responsibility to monitor age changes which may affect a child's eligibility for Cash Assistance.
- b. It is the responsibility of the Case Manager to update TAS with the child's highest grade completed information at the end of each school year for all children in each AU.

B. Change in Resources

- 1. A change in resources** must be reported by the Client within ten days and should be

verified by the Case Manager if necessary.

- 2. Case Manager is responsible for case noting** resource changes in TAS.
- 3. Case Managers must re-evaluate eligibility** to ensure that the client's countable resource limit has not been exceeded before issuing the next grant.

C. General Case Management

1. Home Visits

See Program Standards – Home Visits for more detailed information.

- a. The purpose of a home visit is for the Case Manager to verify residency and household composition, observe the family in their own environment, and further assess the needs of the family, such as:
 - i. Are all appliances working properly?
 - ii. Are there working smoke alarms in the home?
 - iii. Are there needs for repairs, furniture, or food?
- b. The Case Manager will contact the Client to arrange a mutually convenient time for the visit. A Client that sets up a meeting and fails to be present for the meeting without good cause may be subject to a noncompliance penalty.
- c. Workforce Development staff conducting Home Visit will document visit in TAS Case Notes thoroughly.

2. Work Participation

- a. Refer to Client Standards – Work Participation for more specifics.
- b. Work Participation Logs must be submitted to the site by the Client by the fifth of each month (unless the fifth falls on a day the site is closed in which case the next business day)
- c. Work Participation must be entered into TAS by the tenth of the month (unless the tenth falls on a day the site is closed in which case the next business day).
- d. If Work Participation Logs are not submitted by the fifth, the Workforce Development staff will follow the sanction process and no Cash Assistance check will be generated.
- e. Case Manager must calculate work participation hours and enter into TAS.
 - i. Met the Hours
 - 1) Case Manager must case note that the hours were met when doing the grant calculation case note.
 - 2) Case Manager will process Cash Assistance Check as defined below.
 - ii. Didn't Meet the Hours
 - 1) Case Manager will follow Sanction Process and immediately send appropriate notice to Client and Case Note in TAS.

- 2) It is recommended Case Manager will attempt to contact Client in regards to hours not met to attempt reconciliation or discover if good cause exists.

3. Monthly Eligibility Report (MER)

- a. Refer to Program Standards – Monthly Eligibility Report for more specifics.
- b. MERs must be submitted to the Site by the Client by the fifth of each month (unless the fifth falls on a day the Site is closed in which the next business day)
- c. Information on the MER must be entered into TAS by the tenth of the month.
- d. If MERs are not submitted by the fifth, the Workforce Development staff will follow the sanction process and no Cash Assistance check will be generated.

4. Change of Circumstances

- a. Refer to Staff Standards – Changes to a Client’s Case for more details.
- b. The Case Manager must examine the nature of any change reported to determine if eligibility is affected.
- c. Case Manager must thoroughly document any change in Case Notes and action taken.
- d. Case Manager may need to refer Client for new intake or conduct a new intake.
- e. It is the Client’s responsibility to notify SPIPA’s partner agencies such as DSHS and DCS of all significant changes reported to the SPIPA Workforce Development Program. Case managers should remind Clients of their responsibility to notify DSHS and DCS.

5. Processing Notices

- a. Refer to Program Standards – Notices for more specifics.
- b. Most notices will be generated out of TAS.
- c. Workforce Development staff shall complete Notices when printed out of TAS by: checking off a box or filling in a blank with specific information relating to the Client(s). Workforce Development staff must thoroughly document in TAS/Case Notes the type of notice issued, details, and action.
- d. Notices not generated out of TAS shall have the following elements:
 - iv. Reason for the letter.
 - v. Action being taken and/or action being requested from Client(s).
 - vi. Policy that supports the action being taken.
- e. Workforce Development staff shall maintain a copy of letter in the physical file.

6. Determining and Setting Over/Underpayments

- a. Refer to Program Standards – Corrective Payments for more details.
- b. Case Manager may consult with the Site Manager and a member of the Workforce

Development Team when an over/underpayment has occurred.

- c. Over/underpayments must be entered into TAS immediately upon final determination of amount.
- d. Case Manager must send appropriate notice to Client.
- e. Case Manager will enter all this information in TAS located in the TANF Over and Underpayments Section.
- f. Process monthly check **after** recoup plan is in place and Case Noted in TAS.
- g. Workforce Development staff will thoroughly document in TAS the situation which caused the over/underpayment, the payment plan and any other information related to the incident.

7. Determining Income

- a. Refer to Program Standards – Income for more specifics
- b. Income applicable to the grant must be entered prior to generating the Cash Assistance check.
- c. If the income is different than originally projected, an over/underpayment must be established for the difference on the next grant check.
- d. The Case Manager must thoroughly Case Note income. At a minimum, the case note must include: whose income, where the income was from, what employer, and generally how countable income was determined.

8. Processing the Monthly Check

Cash Assistance Check Requests – to SPIPA by the third Thursday of the month unless requested sooner.

Steps for Processing Monthly Assistance Checks

All MERs and WP Activity logs information shall be entered by the 10th of the month.

Completed Logs with Minimum Hours Met

Clients required to participate in Work Activities

- Step 1 Add up WP hours to confirm hours have been met prior to entering.
- Step 2 MERs and Work Activities entered into TAS prior to check processed.
- Step 3 Enter income (if applicable).
- Step 4 Generate check request.
- Step 5 Case Note.

Incomplete Logs without Minimum Hours Met

Clients required to participate in Work Activities

- Step 1 Add up WP hours to confirm hours have not been met prior to entering.
- Step 2 Attempt to contact client to try to rectify hours.
- Step 3 Enter MERs.
- Step 4 When entering Work Activities change Participation Status to a "2" when entering WP hours into TAS.
- Step 5 Change "Did this change compliance?" to "Yes."
- Step 6 Enter Sanction in TAS.
- Step 7 Enter income (if applicable).
- Step 8 Letter of notification for not meeting requirements mailed – by the 10th of the month.
- Step 9 Generate Monthly Grant.
- Step 10 Case Note shall include that minimum hours were not met, and the details of the sanction.
- Step 11 **Client has 15 days to correct sanction or case is to close immediately.**

No Logs Submitted

Clients required to participate in Work Activities

- Step 1 Attempt to contact client to try to acquire logs and/or rectify hours.
- Step 2 If no logs are received, enter Work Activities as "0" and when entering Work Activities change Participation Status to a "2."
- Step 3 Change "Did this change compliance?" to "Yes."
- Step 4 Enter Sanction in TAS.
- Step 5 Enter income (if applicable).
- Step 6 Letter of notification for not meeting requirements mailed– by the 10th of the month.
- Step 7 Case Note
- Step 8 **Do not generate monthly Cash Assistance check if logs are not received.**
- Step 9 **Client has 15 days to correct sanction or case is to close immediately**

No MERs Submitted

Both Needy and Non-Needy Clients required to submit MERs monthly

- Step 1 Attempt to contact client to try to obtain MERs.
- Step 2 When entering Work Activities change Participation Status to a "2" when entering WP hours into TAS.
- Step 3 Change "Did this change compliance?" to Yes.
- Step 4 Complete appropriate Adverse Action in TAS only once.
- Step 5 Enter income (if applicable).
- Step 6 Letter of notification for not meeting requirements mailed– by the 10th of the month.
- Step 7 Case Note.
- Step 8 **Do not generate monthly Cash Assistance check if MERs are not received.**
- Step 9 **Client has 15 days to correct sanction or case is to close immediately**

Clients Exempt from Work Participation

- Step 1 Enter MERs.
- Step 2 Generate check request.
- Step 3 Enter Work Activities as "0" into TAS prior to check processed.
- Step 4 Remember to check for earned or unearned income.
- Step 5 Case Note.

Child Only Clients

- Step 1 Enter MERs information.
- Step 2 Remember to check for unearned income.
- Step 3 If they receive Food Benefits, uncheck the applicable box in TAS before clicking Calculate and adding the grant.
- Step 4 Generate check request.
- Step 5 Case Note.

Suspended Clients

- Step 1 Do not generate a Monthly Grant while a client is suspended.
- Step 2 If the suspension is resolved within the month they are suspended, follow the above steps for generating a grant applicable to their situation.

6 – Definitions

1. 477 - Public Law 102-477 (usually referred to simply as "477") is the Indian Employment, Training and Related Services Demonstration Act (25 U.S.C. 3401 et seq). It was passed in 1992 and amended in 2000. Public Law 102-477 is unique among federal legislation allowing federally recognized tribes and Alaska Native entities to combine formula-funded federal grants that are employment and training-related into a single plan with a single budget and a single reporting system.
2. ACES – (Automated Client Eligibility System) A web-based tool used by Washington State DSHS for determining eligibility, issuing benefits, management support, and sharing of data between agencies.
3. Actual Cost – The exact amount of a service or product.
4. Affiliations – If one member of the household is eligible, the household unit is eligible.
5. Affordable Childcare Arrangement – At or below the parent's share of the childcare costs (co-payments) as calculated by the State/Tribal childcare plans.
6. Appropriate Childcare – Licensed, certified, or approved under State, SPIPA CCDF or Tribal laws and regulations that apply to the type of childcare used according to the client's childcare choice among the options available in the area.
7. Assistance Unit (AU) – All of the family members receiving assistance under the same grant. No Client may receive assistance in more than one AU at any given time. However, a Client may have more than one AU, if one of those cases is a Child Only, in which the HH is not receiving the assistance.
8. Blues (Blue Forms) – The informal name for the monthly required forms which may include the Work Participation Activity Logs, Monthly Eligibility Reports, and Job Search Logs.
9. CASAS – Comprehensive Adult Student Assessment Systems.
10. Child – A child on a grant who is receiving benefits from the Program.
11. Client – A person receiving benefits from the Program.
12. CP – Custodial parent. A parent who has custody of a specified child.
13. Employment and Training – A component of the SPIPA Workforce Development Program that focuses on the education, employment, and training of Clients.
14. Exception to Policy – When policies allow for exceptions, the Client may provide documentation of extenuating circumstances that demonstrate a need for a service whereupon approval of that need does not negate the original intent of the policy.
15. Excluded Resources – Those resources which are not counted whilst determining eligibility.
16. Exemption –When special circumstances, defined within policy, will allow a normally required activity or requirement to be disregarded.
17. HH – Head of Household. The primary individual to which a cash assistance grant is associated.

18. Home Visit – The event in which a Program employee visits a Client’s home.
19. Immediate Family Member – Siblings, parents, children, grandparents, spouse, foster children, adoptive children, grandchildren, relative placement of minors, and family dependents.
20. Individual Service Plan (ISP) – The plan created from the collective efforts of the Case Manager and the Client designed to lead the Client from dependency on government benefits to self-sufficiency, which identifies employment goals, barriers to employment, Support Services needed to overcome barriers to employment, approved work activities, and actions required of the Client to remain in compliance with the Program.
21. Lifetime – The total, cumulative amount of time a Client receives benefits, not individual SPIPA Workforce Development periods, such as instances, cases, or intakes.
22. Luxury – Any item or service that is either not a reasonable necessity to live or is an unnecessary upgrade from a standard item or service.
23. MBTI – Meyers Briggs Type Indicator. A psychological preference assessment.
24. MER – The Monthly Eligibility Report. A form that the Client fills out each month to determine continued eligibility. Part of Blues with the Work Participation Activity Logs and Job Search Logs.
25. Needy – A family where the adult(s) are receiving direct benefits as well as the children, e.g., One-Parent Family, Two-Parent Family, Pregnancy, and Needy Caretaker cases.
26. Otherwise Unserved – not receiving services from another Community, State or Tribal Program.
27. Per Capita Deduction – AKA the Spend Down. The act of disregarding up to \$5,000 of Per Capita per AU by reducing the countable amount by the amount of the total documented allowable costs provided by the Client.
28. PO – A Purchase Order used to obtain goods or services in lieu of paying cash.
29. Program Manager – The Manager of the SPIPA Workforce Development Program or his or her current designee.
30. Private Carrier – A person who is hired to transport a Client in lieu of other reasonable modes of transportation.
31. Reasonable – Under widely held moral principles.
32. Reasonable Distance (for Childcare) – A childcare site that can be reached without travel that exceeds normal expectations within the community.
33. Recipients – A person receiving services from the Program.
34. Rolling Calendar Year – Twelve concurrent months, counting from a specified date, as in April 1 to March 31 and January 28 to January 27, as opposed to a strict calendar year, which is from January 1 to December 31.
35. SPIPA Workforce Development – The South Puget Intertribal Planning Agency Workforce Development program, also known as the Program.

36. SSI – All income that is associated with Social Security.
 37. TABE – Test of Adult Basic Education. Measures education and skill levels.
 38. The Program – The South Puget Intertribal Planning Agency Workforce Development Program.
 39. Three Month Logic – The manner in which three consecutive months affect each other during a Workforce Development period. I.e., one month will use the prior month's income to calculate the following month's grant amount. E.g., a case manager will calculate September's grant, in August, using July's income.
 40. TICS or TIC Screens – (Time In Clock) Reports done using information gathered in ACES to determine an applicant's or Client's TANF 60-month count, income, household composition, and resources that Washington State is aware of.
 41. Unsuitability of Informal Childcare – Care that does not meet the standards of reimbursable childcare including providers who do not pass a background check, or who cannot ensure the health and safety of children in their care.
 42. VR – (Vocational Rehabilitation) provides services to American Indians with disabilities who are seeking employment.
 43. WIOA – (Workforce Innovation and Opportunity Act) an employment and training program designed to provide services and training to qualified candidates who are unemployed. Also assists dislocated workers with training for a new career.
 44. Workforce Development Team – comprised of the Compliance Analyst, Workforce Navigator, Quality Assessment / Quality Improvement Analyst, and Workforce Development Support.
 45. WP – Work Participation. The average weekly hours that an adult Client is required to do in order to be in compliance with The Program.
 46. Short term workshops – A workshop that leads to a credential, such as but not limited to, flagger card, forklift certification, food handlers' card, CDL.
 47. Low-Income – individuals/families who qualify for services whose income is below federal poverty guidelines
 48. Urgent – Compelling immediate action or attention; pressing
 49. Emergent – occurring unexpectedly and requiring urgent action; sudden – happening without warning or in a short space of time
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7 - Appendices

A. Selective Service

It's important to know that even though he is registered, a man will not automatically be inducted into the military. In a crisis requiring a draft, men would be called in a sequence determined by random lottery number and year of birth. Then, they would be examined for mental, physical, and moral fitness by the military before being deferred or exempted from military service or inducted into the Armed Forces.

<https://www.sss.gov/register/who-needs-to-register/>

Register to be Eligible for Benefits and Programs Linked to Registration

A man who fails to register with Selective Service may be ineligible for opportunities that may be important to his future. He must register to be eligible for federal student financial aid, state-funded student financial aid in many states, most federal employment, some state employment, security clearance for contractors, job training under the Workforce Innovation and Opportunity Act (formerly known as the Workforce Investment Act), and U.S. citizenship for immigrant men.

Student Financial Aid

Men, born after December 31, 1959, who aren't registered with Selective Service won't qualify for federal student loans or grant programs unless they are registered. This includes Federal Pell Grants, Federal Supplemental Educational Opportunity Grants (FSEOG), Direct Stafford Loans/Plus Loans, National Direct Student Loans, and College Work Study.

Citizenship

The U.S. Citizenship and Immigration Services (USCIS) makes registration with Selective Service a condition for U.S. citizenship if the man first arrived in the U.S. before his 26th birthday.

Federal Job Training

The Workforce Innovation and Opportunity Act (formerly the Workforce Investment Act (WIA)) offers programs that can train young men seeking vocational employment or enhancing their career. This program is only open to those men who register with Selective Service. Only men born after December 31, 1959, are required to show proof of registration.

Federal Jobs

A man must be registered to be eligible for jobs in the Executive Branch of the Federal Government and the U.S. Postal Service. Proof of registration is required only for men born after December 31, 1959.

Penalties for Failing to Register

If required to register with Selective Service, failure to register is a felony punishable by a fine of up to \$250,000 and/or 5 years imprisonment. Also, a person who knowingly counsels, aids,

or abets another to fail to comply with the registration requirement is subject to the same penalties.

Unless a man provides proof that he is exempt from the registration requirement, his failure to register will result in referral to the Department of Justice for possible investigation and prosecution.

In addition to potential criminal penalties, failure to register may make a man permanently ineligible for the benefits listed above.

NOTE: Some States have created additional consequences for men who fail to register.

B. Cash Assistance Matrix

CHILDCARE Section (Reserved)