TANF & BFET ELEMENTS ONLY

Talent and Prosperity for All

Washington's Operational and Program-Specific Workforce Plan Components

January 29, 2020 Update
DRAFT FOR RELEASE

Washington State Workforce Training

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

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

> ***(a) Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act).***

On November 1, 1997, Washington's WorkFirst Program became operational statewide. The program design was to move families on welfare into employment as quickly as possible through upfront job search, work experience activities, and short-term education and training.

The State has instituted, by rule, uniform program policies in all political subdivisions, including uniform TANF cash benefit standards.

Washington State provides cash benefits to all needy families who meet the eligibility criteria established by rules of the Department of Social and Health Services and in accordance with this State Plan. WorkFirst is the major cash assistance program providing cash benefits and services for low-income families with (or expecting) children in Washington State.

The WorkFirst program offers services and activities to help people in low-income families find jobs, keep their jobs, find better jobs,achieve financial stability and move toward financial success. Low-income families are those with income below 200 percent of the Federal Poverty Level (FPL). The program links families to a variety of state, federal, and community resources to meet this goal. Examples include:

(1) Child support collection

(2) Food assistance

(3) Subsidized child care

(4) Medical assistance

(5) Tuition assistance at community and technical colleges

(6) WorkFirst support services

WorkFirst support services include assistance with supports such as work clothing, work tools, car repair, driver's and vehicle licensing, and transportation. Job preparation services also include education and training tuition assistance, books, test fees and subsidized work experience. These services are designed to help individuals keep their jobs or get better jobs.

The WorkFirst Program is focused on obtaining paid, unsubsidized employment for all recipients who are able to work. In addition, WorkFirst is dedicated to assisting families up and out of poverty once they become employed by providing employment retention and wage progression services. In operating the WorkFirst Program, the State will:

- Provide an up-front employability screening and assessment for participants prior to any job searchactivity assignment in order to assess the individual's work readiness and barriers to employment
- As appropriate, require participation in initial job search as one method to determine employability and refer for further assessment if participation fails to find a job
- Reassign participants who do not find work, to additional job search activities for a short length of time, to paid work experience, subsidized employment, other work-like activities, or barrier removal activities as determined appropriate by assessment
- Provide post-employment services to assist clients in remaining employed and to progress in skills and wages
- Provide educational opportunities in the context of learning while working, both in classroom settings and on the work-site
- Encourage a new alliance of state, local, and tribal government, business, faith-based organizations, nonprofit organizations, and individuals, who dedicate themselves to helping families in poverty overcome barriers. (See RCW 74.08A.280(2))

As the WorkFirst program has evolved, more emphasis has been placed on overcoming barriers to employment, job retention, and reducing the re-cycling that characterizes a significant part of the TANF population.

Temporary changes to the TANF program in response to COVID-19

During the COVID-19 pandemic statewide emergency declared February 29, 2020, the State of Washington is making a number of temporary changes to the TANF program based on the situation, which will remain in place until the Governor's emergency declaration ends or as otherwise directed in writing by the Governor or legislature:

The State finds that all families receiving WorkFirst have good cause for not participating in required activities due to illness, missed work caused by illness and economic disruption, lack of child care, K-12 school and early learning closures, preservation of health, and reduced activity opportunities due to site closures. Parents can choose to begin or continue their participation in WorkFirst activities, to the extent feasible and available. Participation opportunities include:

- remote and distance learning for job skills training, vocational education and life skills classes
- virtual job search activities
- participation in mental health, substance abuse, family violence, or housing search offered via phone or other means,

The opportunity to participate in WorkFirst services will be offered each month; however, if a participant does not engage in the activities listed in their Individual Responsibility Plan, no adverse action will be taken as a result during the declared health crisis. This includes temporarily suspending any reductions or terminations to TANF grants as of March 16, 2020. Work participation requirements outlined above will resume once the Governor has declared an end to the COVID-19 pandemic emergency or otherwise directed in writing by the Governor or legislature. Further, Washington is opting to temporarily extend assessment deadlines out 90 days, as allowed by 45 CFR 261.11(b) in order to handle the increased eligibility workload with reduced staffing resources due to the pandemic.

As a result of the COVID-19 national emergency, most Washington State Department of Social and Health Services offices are closed to the public and providing very limited in-person services. To maintain benefits for families as we continue to determine eligibility and provide case management to the increasing applicants and current participants, a certification waiver will be provided to all households with an eligibility review in April, May, or June of 2020. These families will have their certification period automatically extended for six additional months. This will ensure households who are unable to call, who do not have access to the internet, and those caring for ill family members or are themselves ill, will continue to receive benefits without interruption. Additionally, to manage workload and balance case management across months, DSHS will provide a waiver to all households with a mid-certification review in November 2020 to June 2021 and an eligibility review deferral to households with an eligibility review in November or December 2020.

In addition, effective April 1, 2020, the State temporarily expanded the TANF 60-month time limit extension criteria to support families experiencing hardships due to the COVID-19 emergency. In addition to the additional hardship families face directly due to the pandemic, they are also severely limited by it in being able to document disability, participation in domestic violence services and other standard hardship criteria. The temporary extension will be offered to families who do not meet any other hardship criteria but are still unemployed and ineligible for unemployment benefits. If the family is financially eligible and is experiencing additional barriers due to the COVID-19 crisis, they will continue to receive TANF assistance while the emergency is in effect. Once the emergency ends, our staff will connect with families to assess whether they meet any of the regular hardship criteria. Those families who do not meet any of the hardship criteria will have benefits terminated.

(b) Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act)

The State includes the following activities in its definition of work:

- Unsubsidized paid employment
- Subsidized paid employment
- Work experience
- On-the-job training
- Job search and job readiness assistance
- Life skills training
- Community service
- Vocational education
- Job skills training related to employment
- Education related to employment for a parent who has not completed high school or equivalent
- Volunteering in a child's licensed child care, pre-school or elementary school
- Internships
- Practicums
- Participation in other programs to become employable to the extent federally countable such as
    - Mental health services
    - Family violence services
    - Substance abuse services
    - Searching for housing
- Participation in post-employment activities to the extent federally countable

What criteria will Washington State use to determine whether a parent or caretaker relative is ready to engage in work before 24 months?

The State requires all WorkFirst clients to be screened upon application and then enter into an initial work search or take whatever actions necessary in order to productively engage in the initial work search.

What criteria has the State established relative to a single custodial parent's "demonstrated inability" to obtain needed child care?

The State recognizes that informed choice is consistent with individual responsibility and that parents should be given a range of options for available child care while participating in the WorkFirst Program. Criteria established for "demonstrated inability" to obtain needed child care include:

- Is not affordable (costs more that the co-payment would be under the Working Connections Childcare Program)
- Is not appropriate (not licensed, certified or approved under federal, state, or tribal law and regulations for the type of care used or there is no appropriate and approved relative or in-home provider available)
- Does not meet the level of care required for a child with special medical or behavioral health needs, or
- Is not within a reasonable distance (within reach without traveling farther than is normally expected in the community)

(c) Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific analysis of how the State's workforce development activities are addressing employment and training services for parents or caretakers receiving assistance.

Work Participation Focus In operating the WorkFirst program, the State uses the work participation rates specified in federal welfare reform legislation (P. L. 104-193) as its work participation goal. However, the state, to the extent possible, will use the work participation rates as a minimum standard and will work toward exceeding these goals. Washington has established program goals around reduced caseloads and wage progression efforts with the expectation that low-income families will be lifted up and out of poverty through employment, and WorkFirst is designed to meet that expectation. To the degree possible, all low-income families will have access to services that will help them gain in work skills and earn enough to become financially stable.

The State has used various welfare-to-work models, including models focused on moving job ready individuals into work as rapidly as possible, and providing employment-related training that is expected to lead directly to work for those lacking work skills.

Cross-Agency Collaboration While the Department of Social and Health Services is the single State agency responsible for administering the TANF program, six core state agencies are designated to work together to manage the WorkFirst program. These agencies include the Office of Financial Management, Department of Commerce, the Employment Security Department, the Department of Social and Health Services, the State Board for Community and Technical Colleges, and the Department of Children, Youth & Families (DCYF).

More specifically, the Employment Security Department provides labor exchange (Wagner-Peyser) services for WorkFirst clients, the community and technical colleges provide various kinds of vocational education and subsidized work experience, and the Department of Commerce provides subsidized jobs and unpaid work experience opportunities for clients with barriers to employment. In addition, DCYF has a subsidized child care program for low-income working families and those participating in TANF/WorkFirst and Basic Food Employment and Training (BFET). DCYF also manages the state-funded pre-kindergarten program, a home visiting system and other family strengthening services for low-income, at-risk, pregnant, or parenting families, including those receiving TANF. The WorkFirst Partnership Team works for collaboration and innovation across agencies and direction comes from the WorkFirst Leadership Team and the Legislative-Executive WorkFirst Poverty Reduction Oversight Task Force.

Within the Department of Social and Health Services, the Division of Vocational Rehabilitation serves TANF/WorkFirst clients who qualify under its rules.

Post-TANF parents may be eligible for services through the BFET program up to its eligibility threshold of 200% of the FPL.

TANF Employment and Training Needs Addressed in Workforce Development System In the TANF program, the education and training options for parents are circumscribed by the work participation rate target and various process rules that don't apply to the WIOA core programs. Examples include: the 12-month limit on stand-alone vocational education and the 30% cap for vocational education participation. On the other hand, strengths of the TANF funding stream include ability to provide tuition assistance and childcare for parents engaged in approved education and training activities.

Historically, previous to WIOA, the one-stop workforce development system in Washington State did not prioritize providing services to clients with the range of barriers to employment identified in WIOA, who can be found in disproportionate numbers on the TANF caseload. With the expanded number of partners represented in this Combined State Plan, and the efficiencies that go with improved coordination, Washington State seeks to improve its capacity to serve these disadvantaged populations. This will be accomplished through intentional work at both the local and state levels and through the articulation of partnerships, services and strategies within Memoranda of Understanding, and local plans.

(d) Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)

The State has established confidentiality rules and procedures within the guidelines provided under state (RCW 74.04.060 and RCW 74.04.062) and federal law. The following changes have been made in response to state and federal welfare reform legislation:

The State has revised confidentiality provisions that expand access to client records by law enforcement officials. Specifically, in accordance with state welfare reform legislation, the Department of Social and Health Services will disclose the current address and location of a WorkFirst recipient to an officer of the law or a person identified as a United States immigration official if the department is given the recipient's name and social security account number and the officer/official satisfactorily demonstrates that the recipient is a fugitive, that the location or apprehension of the recipient is within the officer's/official's duties, and that the request is made in the proper exercise of those duties. In addition, if the department becomes aware that a WorkFirst recipient is the subject of an outstanding warrant, the department may contact the appropriate law enforcement agency and, if the warrant is valid, provide the law enforcement agency with the location of the recipient.

The Department of Social and Health Services will provide the Employment Security Department with the names and social security numbers of all recipients in the WorkFirst program (or any successor state welfare program). This information will be used for the purposes of statistical analysis and evaluation of the WorkFirst (or any successor state welfare) program only.

Attachment A [of the TANF State Plan] is written certification by Governor Jay Inslee that during the fiscal year the State will: Establish and enforce standards and procedures to ensure that the State will screen for and identify WorkFirst clients with a history of family violence as defined under P. L. 104-193 (while maintaining confidentiality), refer such individuals to counseling and supportive services and waive some requirements, such as time limit, work participation, and child support cooperation, in cases where compliance with such requirements would make it more difficult for clients to escape family violence or unfairly penalize clients.

(e) Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act)

Under state welfare reform legislation, the director of the Office of Financial Management established an interagency task force on unintended pregnancy in order to: review existing research on the short and long-range costs; analyze the impact on the WorkFirst program; and develop and implement a state strategy to reduce unintended pregnancy.

The Department of Social and Health Services , Health Care Authority , Department of Health , Office of the Superintendent of Public Instruction and other state programs established goals and have continued to take action to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on teenage pregnancies. The numerical goal for reducing the illegitimacy ratio of the state was established at 1% per year for federal Fiscal Years 2009, 2010, and 2011. The current focus is to decrease unintended pregnancy, empower families to choose if and when they have children, and increase access and decrease barriers to quality family planning services.

Through a federal waiver, called TAKE CHARGE, the State provides pre-pregnancy family planning services to citizen men and women with family incomes up to and including 260% of the FPL. The State also extends eligibility for family planning services to citizen women up to 260% of the federal poverty level for a year after their pregnancy ends. Non-citizen women with Medicaid coverage for the birth of a child receive state-funded family planning services for one year after the end of their pregnancy. These women are NOT eligible for family planning services under the federally-approved family planning waiver. Non-Medicaid, low-income men and women can also receive family planning services through Department of Health Title X-funded family planning clinics.

Additional programs that contribute to achieving goals for preventing and reducing out-of-wedlock pregnancy include:

- The Washington College Grant and College Bound Scholarship programs for low-income students wishing to pursue higher education;
- The Early Childhood Education Assistance Program serving low-income three and four year old children;

- The Promoting Academic Success and Learning Assistance Programs for low-income and high-risk public school students; and
- The full-day kindergarten and reduced class size programs in high-poverty elementary schools.

All of these programs affect long-term outcomes including reduced likelihood of contact with the criminal justice system, higher earnings as adults, less reliance on social services as adults and fewer out-of-wedlock births.

(f) Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act)

Washington State conducts a program reaching a variety of stakeholders and partners to educate and train on the problem of statutory rape; specific examples are highlighted below.

Please note - crimes that may be considered statutory rape in other states, are considered 'rape of a child' under Washington statute. This distinction was deliberate to underscore that adolescents and teens under particular ages are not able to consent to sexual acts.

In conjunction with the Washington State Association of Prosecuting Attorneys, through the WAPA/State Judicial Case Processing Task Force, Washington State has developed mandatory reporting protocol for child support cases meeting the criteria for child rape. TANF and other public assistance program staff receive detailed direction on how to report suspected rape of a child to law enforcement. In addition, under state welfare reform legislation, minor parents' or pregnant minors' living situation cannot include an adult parent of the qualifying child if that parent is convicted of 'rape of a child' (RCW 9A.44.079).

The state convenes an Interagency Workgroup on Unintended Pregnancy Prevention to review current outreach programs for men and women. This workgroup makes recommendations concerning the incorporation of appropriate education about the crime of 'rape of a child'. Washington State also has a robust sexual and domestic violence prevention approach, with the Washington Coalition Against Domestic Violence (WSCADV) & Washington Coalition of Sexual Assault Programs (WCSAP) being national leaders in prevention. Within the contract between DSHS and WSCADV, there are resources and training efforts dedicated to the "Healthy Relationships" approach, which focuses on identifying and promoting protective factors and establishing appropriate and healthy relationships.

Local sexual assault and domestic violence programs in Washington also have a significant focus on community education and prevention. The curricula seek to increase awareness and build the skilols of community members to reduce risk factors and build protective factors against child rape and other forms of sexual abuse. Emergency shelter contractors funded through the state's Family Violence

Prevention Services Act and Victims of Crime Act grants are required to conduct prevention and community education activities as well. Sexual assault services grantees, funded through Washington's Office of Crime Victims Advocacy, conduct sexual violence education and prevention with key stakeholders in local communities. Key targets for these efforts include those working in law enforcement, education and mental health counseling.

Educational offerings are designed to promote healthy, safe, relationships; address attitudes and beliefs related to a culture of perpetration and are often targeted at youth/teens.

(g) Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act)

In 2011 the legislature enacted RCW 74.08.580 to address concerns regarding use of benefits at prohibited establishments, specifically, the following activities and products: gambling, pari-mutuel betting, lottery tickets, tattoos, body piercings, tobacco products, and alcoholic beverages. It further prohibits taverns, beer/wine specialty stores, nightclubs, contract liquor stores, bail bond agencies, gambling establishments, tattoo/body piercing shops, adult entertainment venues, or any establishment where persons under the age of eighteen are not permitted, from having Automated Teller Machines (ATMs) and Point of Sale (POS) terminals on their premises that accept EBT cards.

The Department compares a list of EBT transactions at ATMs and POS machines monthly to a list of prohibited locations throughout the State provided by appropriate licensing authority for the state. The state Office of Fraud and Accountability or the state licensing authority for that business type (e.g. Liquor Control Board, Gaming Commission) physically inspects the location to verify that the match is accurate and appropriate and first sends letters to non-compliant businesses and clients. Continued non-compliance by businesses results in referral to the individual licensing authority for regulatory action. Continued non-compliance by clients results in the opening of an intentional program violation investigation.

(h) Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)

Adequate authorized access to cash by recipients is ensured via an analysis required of the EBT vendor. The vendor is required by contract to perform a cash access assessment on an annual basis. The results are reviewed with the Department to address any drought identified, especially related to remote locations. If such a locale is identified during the annual review, the EBT vendor is prepared to deploy EBT-only point-of-sale (POS) machines that would allow case transactions and cash-back access for those clients.

As of August 1, 2012, the EBT ATM fee imposed by Washington State's EBT vendor was eliminated. DSHS notifies clients that if they choose to withdraw cash benefits using an ATM, they may incur a surcharge for the transaction by the bank or ATM owner. Clients are encouraged to use POS terminals to avoid potential ATM surcharges. Retailers that accept EBT cards have the Quest mark decal that shows what benefits are accessible at each POS and ATM location. Clients can also log onto their online account and search for Chase ATMs or the client can contact CSD to conduct a search of filtered retailers by ATM, POS, or both.

This information is provided on the form "Your DSHS Cash or Food Benefits" (DSHS 14-520), or the informational pamphlet "Your Washington EBT Quest Card" (DSHS 22-310), which is given over the counter in offices or mailed to clients. In May 2000, DSHS implemented Electronic Funds Transfer (EFT), allowing TANF clients to have their cash assistance deposited if they have a new or current personal bank account. DSHS educates TANF clients about EFT enrollment when they receive the EBT card.

(i) Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)

Families from other states receive the same benefits as other longer term Washington state residents.

(j) Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)

The State exercises its option to provide federally funded TANF, Medicaid, and social services block grant (SSBG) benefits to qualified alien families who are eligible to receive these benefits. The State provides State Family Assistance which is a state-funded cash and medical benefits to those individuals who do not qualify for federally-funded assistance because of their immigration status, but otherwise meet all other eligibility requirements, including children and pregnant women. These are segregated funds and expenditures are claimed toward the state's MOE requirement.

The State follows federal sponsor deeming rules for qualified alien families receiving federally funded benefits. The income and resources of the sponsors for families receiving state-funded assistance are

deemed until the sponsored immigrant becomes a naturalized U.S. citizen or has 40 work quarters under the Social Security Act. Sponsor liability does not apply to the victims of domestic violence who self-petitioned under the Violence Against Women Act and their dependents.

(k) Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act)

The State will provide client protections by requiring that clients are treated with dignity and respect, are given sufficient opportunity to make their needs known to the Department, are free from discrimination on any basis prohibited by state or federal law, have their eligibility determined according to rules and procedures of the Department promulgated pursuant to the Administrative Procedures Act (RCW 34.05), are permitted to make applications for benefits and have the application processed and decision made in a timely manner, have their rights and responsibilities explained to them, are informed of which programs and services are available to them through the Department, have the conditions, requirements and benefits for which they are eligible explained to them, and are allowed to exercise, after full explanation, options and choices available to them.

Fair and equitable treatment does not mean that all WorkFirst benefits and services are available to all clients in all areas of the state at any one time. The State's need in some cases to gradually phase in a new service or to undertake pilot initiatives for purposes of determining program effectiveness may limit access to some services for some clients for limited periods of time.

Washington will ensure applicants and recipients of assistance are notified in writing: of the decisions of the Department regarding the type and amount of benefits available to them, including an adequate and advance notice of adverse actions; the legal basis for the determination; that they may request, within 90 days of such notice an administrative hearing, with due process protections, and conducted by the independent Office of Administrative Hearings pursuant to Chapters 74.08 and 34.05 RCW; and that they may obtain judicial review of an adverse decision without payment of a fee or posting a bond for filing such appeal or preparation of any necessary record. The State will provide an opportunity for any applicant or recipient aggrieved by an agency action to have an impartial administrative hearing before an Administrative Law Judge pursuant to RCW 74.08.080 and Chapter 34.05 RCW. The State will continue benefits pending the hearing decision, pursuant to Washington Administrative Code 388-458-0040.

The TANF cash assistance program has a statewide process for conducting application interviews for consistent application of eligibility rules that include:

- Household composition (TANF/WorkFirst):
    - Minor child(ren) 17 years or younger or child(ren) under age 19 who are making progress in High School (HS) or HS equivalency program

    - Pregnancy at any stage
    - Parents or related needy caregivers of specific degree (e.g. those caring for grandchildren, nieces/nephews)
- Residency:
    - Currently living in Washington state with no minimum time to establish residency
- Citizenship/Alien Status:
    - US Citizens and
    - Qualified non-citizens with use of Systematic Alien Verification for Entitlements (SAVE)
- Social Security Number (SSN) requirements:
    - Supply or apply for SSN or
    - Provide good cause for not applying/supplying
- Assignment of child support rights:
    - Cooperate with establishing child support or
    - Provide good cause for non-cooperation
- Financial Eligibility for aided household members:
    - Countable income below designated standard is based on household size and published in WAC
    - Countable Resource Limits
        - $6,000 cash resource limit
        - $10,000 vehicle exclusion
- At or below Federal Time Limit of 60 months for recipients or
    - Meet Time Limit Extension Criteria (TLE) for aid after 60 months
        - Disabled and applying for SSI
        - Caring for disabled adult or child
        - Homeless
        - Working 32 or more hours/week
        - First time dependency with child welfare agency
        - Addressing family violence
- Other TANF programs:
    - Kinship Care TANF:
        - Relatives of a specific degree
            - Must cooperate with assignment of child support unless good cause claimed for non-cooperation
        - No current income or resource limits as not subject to deeming as caretaker
        - Any income to child, including Title IV payments, is calculated
        - Not subject to TANF time limitations
    - In-Loco Parentis TANF:
        - Adults acting in place of parent without relation to specific degree with or without legal guardianship
        - Cooperate with child support assignment Unless good cause claimed for non-cooperation
        - Pass background checks
        - No income or resource limitations as not subject to deeming
        - Any income to child, including Title IV payments, is calculated
        - Not subject to TANF time limitations

The following must be included in the household receiving TANF:

- The child applied for and the child's full, half or adopted siblings;
- The child's natural, adoptive parents or stepparents;
- Pregnant minors and minor parents who live with parents who need assistance (may include other siblings); and
- Pregnant individuals with no other dependent children residing with them.

The income disregards for mandatory household members are:

- An earned income disregard of 50 percent is applied to applicants/recipients, including working minors who are not currently enrolled or making progress in school or 100% for working minors enrolled in school
- Only a portion ofthe income/resources of the parents of a minor parent is deemed as available, if the minor parent, living in the household, is applying for TANF with their own dependent child(ren). This includes the parents of a pregnant minor.
- All SSI income.
- Household members who are ineligible due to immigration status.
    - Income for ineligible family members is totaled.
        - Earned income is given a 50% deduction and totaled with unearned income;
    - The payment standard for the eligible household members is subtracted from the payment standard for a household that would include ineligible members; a
    - After income is totaled, the difference between the two payment standards is subtracted and the following is deducted:
        - Legally-ordered child support
        - Employment-related child care expenses
    - Whatever is left over, after deductions, is counted for the household.

(l) Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—

(1) providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or

(2) in other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.

The state will assist TANF adults in receiving training for or obtaining employment in eldercare related employment in the home, health, community care, and long-term care facilities when there are identified employment opportunities in local communities.

In general, the TANF/WorkFirst program seeks to balance meeting the needs of adults, based on their particular work histories, employment barriers, and personal goals, with the actual opportunities

available to them on the job market. As indicated under (c) above, the Department relies upon its WorkFirst partner, the Employment Security Department, to provide job market information and other employment services to its clients. The State Board for Community and Technical Colleges, another WorkFirst partner, provides oversight of high-wage, high-demand education and training program approval and career pathway planning services to clients. The ultimate goal is economic self-sufficiency and an end to reliance on public assistance.

(m) Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)

MAINTENANCE OF EFFORT (MOE)

Through a variety of state and community-based service providers, the State offers the following types of services which help families remain intact, reduce their dependence on public assistance by encouraging employment, reduce risky behaviors which can result in unplanned out of wedlock pregnancies, or support the formation of two-parent families. Services are provided to families (and qualifying non-custodial parents) whose income is at or below 400% of the (FPL):

a) Financial literacy;
b) Classes in child development, community resources, and parenting skills;
c) One-to-one mentoring of children and youth in professionally supported relationships;
d) Individual, marital, and family counseling services, to include domestic violence counseling for victims and offenders;
e) Alternative secondary education for at-risk youth that provides education, clinical counseling, and social services to students and families who have social adjustment, emotional, or school related difficulties;
f) Community centers that provide family support and family preservation services;
g) Domestic abuse shelters that provide victims of domestic violence and their families with a safe haven of temporary shelter with provisions for basic needs (food, clothing, etc.), counseling, and services for children;
h) Housing for eligible victims who need safety and support and are ready to go to school/work;
i) Preschool programs for 3 and 4 year old children provided at no cost to income eligible children;
j) Medical services and financial benefits to needy family members to address work-related injuries;
k) Domestic violence services such as assessment service, planning, counseling services, case management, and linkage and referral to recipients of TANF who have or are currently experiencing issues of safety and functioning related to domestic violence, which would adversely affect their ability to become self-sufficient;

l) State funded medical care to help needy families;
m) After school programs for children;
n) Food, meals, groceries, and volunteer services at food and commodity outlets and soup kitchens;
o) Services and education activities to prepare for employment;
p) Residential shelter and outreach to eligible teens;
q) One-time financial and material assistance to eligible families;
r) Education and enrichment programs to children from infancy and up;
s) Youth development programs
t) Programs that address social-economic barriers, family violence, inadequate parenting skills, lack of workplace skills, poverty, teenage pregnancy, poor school performance, and behavioral difficulties;
u) Programs that provide public awareness, education, and advocacy to prevent child abuse and neglect in families;
v) Drug and alcohol treatment; and
w) Subsidized and unsubsidized work experience.