

**LOGAN COUNTY BOARD OF HUMAN SERVICES
AGENDA**

May 11, 2022

Central Services Building
508 S. 10th Ave., Sterling, CO

1. Call to Order
2. Approval of Minutes
3. Financial Reports
4. Childcare Exempt Provider's Rate Increase Proposal
5. Discussion/Approval of TANF Policies and Contracts
 - a.) TANF Purchase Approval from Otero County
 - b.) Help for Abused Partners Contract
6. Briefing Highlights
 - a.) Staffing Updates
 - b.) Consultant Contract
7. Next Meeting Date
8. Executive Session, as needed

RECORD OF PROCEEDINGS

LOGAN COUNTY BOARD OF HUMAN SERVICES

April 13, 2022

Logan County Commissioner Chairman Byron Pelton called the Board meeting to order at 9:00 a.m. at the Logan County Central Services building with Logan County Commissioner Joseph McBride, Logan County Commissioner Jane Bäuder, Logan County Human Services' Director David Long, and Logan County Human Services' Recording Secretary Peggy Kircher, present.

Minutes from the Board of Human Services meeting held on March 9, 2022 were presented. Commissioner Bauder moved to approve the Board meeting minutes as written. Commissioner McBride seconded the motion. The motion was approved.

Director Long presented the Commissioners with the Expenditure Summary report dated March 31, 2022, the February, 2022 Allocation Tracking report, and the February, 2022 TANF Reserve Balances report. Director Long said that the fund balance is as healthy as he has ever seen it for this time of year. He said that Karen Milner, finance/accounting manager, does a great job. Director Long requested the Commissioners' approval to purchase between \$80,000 and \$100,000 more TANF dollars from other counties. This would put the Department under the cap which is strategically a good place to have the cap being underfunded just a little bit because it will raise the allocation going into the next year. This would allow the Department to give more funding to Cooperating Ministry if there are additional funds. The Board agreed to have Director Long look for additional TANF funds to purchase from other counties.

Director Long gave the Commissioners the briefing highlights.

Director Long gave the Board information about the State's electronic document management system. Some counties purchased their own paperless system prior to the State's implementation of the EDMS system. Now the State wants to figure a way to tie all of the Counties' EDMS systems together. Some Counties are not willing to work with the State and are not willing to change their systems. This battle between the State and the Counties will not have any impact on Logan County.

Director Long informed the Board that he received the email memo from Diana Korbe, Logan County HR, regarding the annual employee performance appraisal evaluations, merit pay, and all department job descriptions. Chairman Pelton said that the new performance appraisal evaluations need to be used and the supervisors can determine if they want to perform the employees' performance evaluations using the self-evaluation process or the supervisor can complete the evaluation without the employee's self-evaluation. Commissioner McBride said that the self-evaluation process might be helpful with new employees.

Director Long gave the Board the staffing updates.

Director Long said that Peggy Meis, Resource supervisor, will be retiring on May 31st. Three internal caseworkers applied for the position and interviews were completed. Crystal Jackson, intake caseworker, was hired to fill the upcoming vacant Resource supervisor position. Director Long said that the Department has some really good employees in the child welfare units. Anthony Avalos applied for the upcoming supervisor vacancy but he was not chosen for the position. Director Long inquired if the Board would consider creating an additional manager level position under the supervisors to the organization chart in child welfare that Anthony Avalos could be moved into to utilize his talent. As a manager, his experience and knowledge could help other case workers in the mental health area; being a value allowing him to consult with other caseworkers to be able to help identify behavior modification ideas and strategies in regards to mental health. Director Long would like Mr. Avalos to start working on getting his degree in mental health. He would like to create the ability and give him the recognition and the pay to go with it to keep him working at Logan County DHS. The Commissioners are in favor of looking at the idea and hearing Director Long's request. Commissioner Bauder said that she would be in favor of looking at the idea to utilize Mr. Avalos' talents and encourage him to use them. She said that this would give him job satisfaction so he would stay. Commissioner McBride said that historically this has not been done for any county departments. He would like to complete the salary survey first before adding levels and positions. He said that there have been other departments that have requested similar ideas and they have been turned down. Commissioner Pelton asked if this would cause conflict between the supervisors and the caseworkers. Director Long said that it would not cause conflict right now with the current staff.

The next Logan County Board of Human Services meeting will be held on May 11, 2022 at 9:00 a.m. at the Logan County Central Services building.

There being no further business to come before the Board, the meeting was adjourned at 9:28 a.m.

Respectfully submitted,

David E. Long, Director

Approved by:

Byron H. Pelton, Chairman
Logan County Commissioner

Joseph A. McBride, Logan County Commissioner

Jane E. Bauder, Logan County Commissioner

LOGAN COUNTY
DEPARTMENT OF HUMAN SERVICES
EXPENDITURE SUMMARY
April 30, 2022

ADMINISTRATION:

APR 08 SALARIES/BENEFITS	\$107,207.39
APR 22 SALARIES/BENEFITS	165,878.58
APR 05 INVOICES APPROVED/PAID	42,566.38
APR 12 INVOICES APPROVED/PAID	23,313.75
APR 19 INVOICES APPROVED/PAID	44,520.96
APR 26 INVOICES APPROVED/PAID	9,336.19
APRIL CANCELS	0.00
CASH DISBURSEMENTS LESS CANCELS FOR APR 2022	<u>\$392,823.25</u>

THIS IS TO CERTIFY THAT THE AUTHORIZATIONS AS SET FORTH BELOW ARE THE TRANSMITTALS MADE TO THE DIFFERENT CATEGORIES TOTALING THE SUM OF \$1,055,730.89 FOR THE MONTH OF APRIL, 2022

COLORADO WORKS	31,011.00
CHILD CARE	20,434.87
CHILD WELFARE CASE SERVICES	2,703.92
CHILD WELFARE	219,265.69
TANF BURIALS	0.00
CORE CASE SERVICES	26,715.75
LEAP BASIC AND CIP PROGRAMS	55,193.24
AID TO NEEDY DISABLED	7,750.18
SSI HOME CARE ALLOWANCE	1,274.00
OLD AGE PENSION	24,373.24
FOOD ASSISTANCE	664,691.00
FOOD ASSISTANCE JOB SEARCH	<u>\$ 2,318.00</u>
TOTAL EBT/EFT AUTHORIZATIONS	<u>\$1,055,730.89</u>
TOTAL CASH AND EBT/EFT	<u>\$1,448,554.14</u>

MARCH

COUNTY BUDGET YEAR 2022 - Average for 3 months is .25%

Our 3 month operating excess is \$120,978.48. This is an increase of \$478.04 from last month. This creates an interim Fund Balance of \$1,470,014.09. Our budget is .215% expended (underexpended). Revenues collected are at .252%.

STATE ALLOCATIONS - Average for 9 months is .75%

TANF We are underspending @.717%. Projected excess to date is \$32,984.

CC We are underspending @.518%. Some of our child care is being paid monthly with pandemic funds which takes it out of the CC Block grant.

CW We are overspending @.818% with a projected deficit of **\$259,874**. The BOS counties are slightly overspending. With mitigation, we should be covered at close.

CW Education Stability No expenditures yet.

100% Staffing We are overspending @ **.834%**. The projected deficit is **\$6,941**. Any deficit after surplus distribution will be moved to the CW Block.

CORE We are overspending @ **1.27%**. The projected deficit is **\$295,126**. The BOS counties are currently underspending so this is not an issue to date.

ADM ADM has 3 pots of money, each closes with it's separate methodology. Combined we are overspending @ **.954%**. The projected deficit is **\$200,146**.

ADULT PROT. We are overspending Adm @ **1.025%**. The projected deficit is **\$34,450**. We are underspending client expenditures @.01% Any deficit is subject to surplus distribution at close and then becomes county only funds.

PHE Medicaid Grant - Our allocation is \$42,229.30 for Enhanced. We have a balance of \$30,914. The Non-Enhanced allocation is \$674.49; we have overspent this allocation by **\$652.05**.

Elder Justice Act We have a balance of \$3,834.

FFY programs I do not anticipate any problems with either of the Federal Fiscal Year programs of Employment First and LEAP

TANF Reserve Balances March 31 SFY 21/22

[illegible]



Logan County

Department of Human Services
POLICY

POLICY TITLE Domestic Violence	REFERENCE C.R.S. 26-2-716 9 CCR 2503-6
POLICY NO. 04 – CWP	EFFECTIVE DATE April 01, 2022
DIVISION DIRECTOR APPROVAL	BOARD OF COUNTY COMMISSIONERS ADOPTION DATE

BACKGROUND & PURPOSE

The presence of domestic violence (also known as family violence) may prevent a client from engaging with the standard components of the Colorado Works (CW) program. The purpose of the policy is to identify how Logan County will support clients impacted by domestic violence (DV), as defined in Colorado Works program rules.

DEFINITIONS

Client - A current or past applicant or a current or past recipient of a CW grant payment.

Colorado Works - The Temporary Assistance for Needy Families (TANF) program in Colorado.

County worker - An employee or designated representative of the county department.

Domestic violence - (also known as family violence) means a pattern of coercive control one individual inflicts upon another in the context of familial, household, or intimate partner (current or former) relationships including marriage and dating. Violence may be inflicted through a variety of means including, but not limited to:

- Physical acts threatening or resulting in physical injury to the individual, including hitting, punching, slapping or biting;
- Intimidation resulting in fear of imminent bodily harm through the use of gestures, displays of weapons, or destruction of property, including pets;
- Threats of or attempts at physical or sexual abuse or other means of coercion and control, including harm to or threats to harm children, other family members, or pets;

- Sexual abuse or threats to inflict nonconsensual sexual acts, including sexual activity with a minor;
- Mental, emotional, or psychological abuse including degradation, constant put-downs, or humiliation that results in a reduced ability to engage in daily activities;
- Isolation from friends, family, or any type of emotional support system;
- Neglect or deprivation of medical care;
- Stalking;
- Economic abuse or control of finances through withholding money or sabotaging attempts to attain economic self-sufficiency; and/or,
- Child molestation, incest.

DV survivor - Any person who has experienced or is experiencing DV as defined above.

Good cause - means circumstances beyond the control of the client. Good cause includes, but is not limited to, medical emergencies or hospitalization; a client who has a disability or other medical condition(s) requiring additional time and/or assistance; a delayed appointment with the Social Security Administration beyond the client's control; or other good cause determined reasonable by the county department using the prudent person principle, including the reasons outlined in 3.608.3. Related to the appeal process, the following circumstances do not constitute good cause: an excessive workload of a party or his or her representative or attorney; when a party obtains legal representation in an untimely manner; a party or his or her representative or attorney's failure to either receive or timely receive, a timely mailed initial decision, or other timely mailed correspondence from the Office of Administrative Courts, the Office of Appeals, or the county department; when a party or his or her representative or attorney has failed to advise the Office of Administrative Courts, the county department, or the Office of Appeals of a change of address or failed to provide a correct address; or any other circumstance which was foreseeable or preventable.

Statewide automated system - The electronic platform used to calculate public assistance program benefits and grant payments.

Workforce Development (WD) - The program provided to clients determined to be work eligible as described in section 3.607.

POLICY

Logan County allows clients to voluntarily and confidentially self-identify as survivors of DV, by providing multiple, safe opportunities for clients to disclose this information, and using trained staff to conduct routine assessments. Screening, assessment and discussions about DV occur in a private confidential area.

Screening and Assessment

Every adult or minor parent on Colorado Works (including clients on child-only cases) must be screened for DV by a worker certified in the Family Violence Option (FVO) at the time of application, before completing a child support referral. Verbal screenings for DV must take place in a private, confidential area where the conversation cannot be overheard by others, and where the client's partner or children are not present. If a conversation is taking place over the phone or by a virtual meeting, the county worker will determine if the client is in a safe environment before discussing the topic. If a confidential environment is not available where a verbal discussion would not be overheard, the screening might be performed non-verbally (using a screening document or form), or the conversation might be deferred to another time. If the screening for DV must be deferred, the county will identify that child support good

cause is pending in the statewide automated system to ensure that referrals to child support are not made before the client has been screened. DV screenings or discussions will not be initiated, verbally or nonverbally, in the presence of another adult without the CW client's approval.

The State Department *Domestic Violence Screening Form* is a tool that must be added to a client's case file as a record that a screening occurred. Because one "yes" for any item is sufficient to identify a client as a survivor of DV, workers are not required to ask all questions on the form. The individual who conducted the screening and the date it was completed must be documented in the statewide automated system.

When a DV screening identifies the client as a survivor of DV, Logan County will assess the client to determine their needs for support, referrals and waivers.

Self-disclosed information remains confidential, unless information disclosed triggers a mandatory reporting requirement or there is an immediate threat to the safety of the client or others.

Waiver

Logan County will offer the following good cause waivers for DV survivors:

1. Child Support Services: Logan County must offer a child support referral waiver to the DV survivor.
 - a. Logan County will ensure waivers are offered timely and efficiently through the following:
 - i. The determination for the waiver is made during the initial appointment by the intake worker or by the case manager if the initial screening for DV has been deferred.
 - ii. The worker uses the prudent person principle to determine if the client meets the criteria to offer the waiver.
2. Work activities: If a client is identified as a survivor of DV that interferes with the safety and/or ability to participate in the CW Workforce Development (WD) program, Logan County will offer the client a waiver.
3. Time Clock: If a client is identified as a survivor of DV that has reached or is nearing their 60th month on TANF, Logan County will offer the client a 60 month time limit extension according to the Logan County Hardship Extension policy.

Logan County will involve the client in the decision to grant a waiver and the client may accept or refuse any waiver offered. Clients will also be provided information about the statewide Address Confidentiality Program. This referral and associated services will be captured in the Individualized Plan (or in case comment for child-only cases). A continued FVO waiver must be reassessed and documented in the statewide automated system every six months.

Waivers will be accompanied by documentation in the statewide automated system describing the following:

- Past, present and ongoing impact of family violence on the client and family.
- The client's connections to advocacy groups, available resources and support systems.
- Safety planning (details of the plan do not need to be documented).
- Participation in and/or waiver work components.
- Opportunities to improve financial security while maintaining the safety of the client.

Referrals

Logan County provides referrals to appropriate DV advocacy, counseling, and support services, to include the Help for Abused Partners, Centennial Mental Health, law enforcement, and legal aid.. Brochures and other informational handouts regarding domestic and family violence issues are distributed and available in English and Spanish to all CW clients. The information is located in the lobby and all common areas. The information includes, but is not limited to, material from local DV providers, batterer intervention service providers, victim advocate organizations, victim's compensation programs, and DV safety planning.

Training

Logan County staff and any contractor who plays a role in working with CW clients (i.e. intake, eligibility, assessment, case management, investigations, or workforce development) will receive state-sponsored training in recognizing, responding, and referring survivors and/or perpetrators of DV, including associated impacts on economic independence and community resources. After initial training, refresher training will be taken at least once every five years. Logan County will verify that internal staff and contracted staff members as described in this paragraph have been trained.

Signed by:

CHAIR, LOGAN COUNTY BOARD OF COUNTY COMMISSIONERS

DATE



Department of Human Services
POLICY

POLICY TITLE Workforce Requirements & Employment Outcomes	REFERENCE C.R.S. 26-2-703(21); 26-2-711(1)(b) and (5)(a)(b); 26-2-714(5.5) 9 CCR 2503-6
POLICY NO. 07 – CWP	EFFECTIVE DATE April 1, 2022
DIVISION DIRECTOR APPROVAL	BOARD OF COUNTY COMMISSIONERS ADOPTION DATE

BACKGROUND & PURPOSE

The Colorado Works (CW) Workforce Development (WD) program is designed to engage clients with services, opportunities, resources and tools needed to successfully obtain employment. For clients who are not able to work, the CW WD program offers support and services to increase employability and promote family safety and stability.

The purpose of this policy is to ensure Logan County workers provide work-eligible clients opportunities to engage in initial and ongoing program activities. This policy also provides guidance on how to deliver employment and training services, and utilize program resources, such as the Work Verification Plan and the Work Activity Definition Guide to connect clients to employment and training activities.

DEFINITIONS

Assessed need - Any identified need of a client or family receiving CW grant payments beyond ordinary, routine living expenses that is designed to deal with a specific crisis situation or episode of need, is not intended to meet recurrent or ongoing needs, and will not extend beyond four months without a new assessment.

Client - A current or past applicant or a current or past recipient of a CW grant payment.

Collateral contact - A person outside the client's household (excluding sponsor(s) and landlord who also live in the home) who has first-hand knowledge of the client's circumstance and provides a verbal or written confirmation thereof. This confirmation may be made either in person, in writing, electronically submitted, or by telephone. Acceptable collateral contacts include but are not limited to: employers, landlords, social/migrant service agencies, and medical providers who can be expected to provide accurate third-party verification. The name/title of the

collateral contact as well as the information obtained must be documented in the statewide automated system.

Colorado Works (CW) - The Temporary Assistance for Needy Families (TANF) program in Colorado.

County worker - An employee or designated representative of the county department.

Demonstrable evidence (DE) - Evidence that a client has refused to comply with the workforce program.

Good cause - means circumstances beyond the control of the client. Good cause includes, but is not limited to, medical emergencies or hospitalization; a client who has a disability or other medical condition(s) requiring additional time and/or assistance; a delayed appointment with the Social Security Administration beyond the Clients control; or other good cause determined reasonable by the county department using the prudent person principle, including the reasons outlined in 3.608.3. Related to the appeal process, the following circumstances do not constitute good cause: an excessive workload of a party or his or her representative or attorney; when a party obtains legal representation in an untimely manner; a party or his or her representative or attorney's failure to either receive or timely receive, a timely mailed initial decision, or other timely mailed correspondence from the Office of Administrative Courts, the Office of Appeals, or the county department; when a party or his or her representative or attorney has failed to advise the Office of Administrative Courts, the county department, or the Office of Appeals of a change of address or failed to provide a correct address; or any other circumstance which was foreseeable or preventable.

Prudent person principle (PPP) - Based on experience and knowledge of the program, the county department exercises a degree of discretion, care, judiciousness, and circumspection, as would a reasonable person, in a given case.

Sanction - A reduction in CW grant payments for an established period of time as a result of not participating in the WD program.

Signature - Handwritten signatures, electronic signature techniques, recorded telephonic signatures, or documented gestured signatures. A valid handwritten signature includes a designation of an x. For Individualized Plans (IP) and conditions agreements, a verbal agreement is an acceptable signature and must be substantiated with an electronic, recorded telephonic, or written agreement of the terms.

Statewide automated system - The electronic platform used to calculate public assistance program benefits and grant payments.

Supportive payment - A payment and/or service in addition to basic cash assistance or diversion that is based on an assessed need.

Workforce Development (WD) - The program provided to clients determined to be work eligible as described in section 3.607.

POLICY

Initial Workforce Development

Work Eligible Clients

Logan County will ensure all work-eligible clients are referred to the WD program during the eligibility appointment. Cases that do not have a work-eligible adult are considered "child only" cases and these cases are not required to participate in the WD program. Clients are provided the date and time of their first WD program appointment, as well as who to contact if they need to reschedule the first appointment. Clients have the ability to reschedule their first WD appointment within the first full month of being referred to the program.

Demonstrable Evidence

If a client does not develop an IP collaboratively with the county worker upon referral to the WD program, this shall be considered a DE which will result in the closure of the grant payment. Logan County workers must make clients aware of demonstrable evidence during the eligibility appointment and/or when the client is referred to the WD program.

Workforce Development Screening

A WD screening must be completed within 30 calendar days from the date of application for work-eligible clients. The WD screening is conducted automatically through the statewide automated system during the Interactive Interview. The WD screening collects a client's basic skills, past employment history, and employability.

Workforce Development Assessment

Logan County uses the State prescribed WD assessment with all work-eligible clients. The assessment must be completed at a client's first WD appointment and at least once every six months or more frequently if deemed appropriate. The WD assessment must be completed prior to and shall be utilized to inform the development of a client's IP.

- The WD assessment shall be documented in case comments in the statewide automated system within 5 business days of the assessment date.
- Logan County workers will also use the WD assessment to determine the issuance of supportive payments.

Clients may share circumstances that impact their employability during the WD assessment, including:

- Domestic violence
- Substance use
- Resolving medical or mental health issues
- Actively seeking social security income
- Pregnancy
- Primary care for an infant younger than 12-months
- Primary care for a disabled family member
- Child welfare involvement
- No available child care
- Lack of transportation
- Homelessness or inadequate housing
- Other family emergencies on a case-by-case basis

If these circumstances are present, the Logan County worker must list barrier activities in the statewide automated system (Plan screen, Needs Assistance section, etc.). However, barrier activities are not required to be added to a client's IP. Clients are not required to provide documentation for the circumstances listed above. However, the client must create a plan in partnership with the county worker to remain engaged in the WD program. Logan County workers reference the program's Work Activity Definition Guide on how to apply activities.

Condition Agreement

Logan County workers use the State prescribed Condition Agreement that clearly outlines the expectations of Logan County and the client. The county worker shall review the Condition Agreement with the client within 30 calendar days from the date of the WD screening.

Initial Individualized Plan

The initial IP shall be developed at the same time the Logan County worker and client review the Condition Agreement (within 30 calendar days from the date of the WD Screening). The initial IP shall be developed collaboratively between the Logan County worker and the client, addressing any needs, goals, and supports the client or their family may have. The initial IP shall be comprehensive including matters relating to securing and maintaining training, education, or work. No abbreviations or acronyms shall be used on the IP. The IP identifies goals and determines manageable action steps for satisfying the objectives a client has. The Logan County worker shall ensure the client understands the terms of the initial IP and clients must sign the initial IP (see the signature criteria in the definition section of this policy). The initial IP shall be documented in case comments in the statewide automated system within five business days of the initial IP date.

Ongoing Workforce Development Case Management

Logan County's workers must have contact with WD clients at least once every 90 days, but maintain the flexibility to meet more frequently. The contact may include an update to the IP if needed and shall include an assessment for supportive payments (see the Logan County Other Assistance and Supportive Payments Policy). Contact attempts that are unsuccessful shall be documented in the statewide automated system within five business days.

Ongoing Workforce Development Assessment

The State prescribed WD Assessment shall be completed at least once every six months and shall be documented in case comments in the statewide automated system. In addition, the State prescribed WD assessment must be completed by the new county of record within 30 days of a county transfer (based on the date of the transfer county code in the statewide automated system). To ensure the client is assessed timely following a county transfer, Logan County will immediately contact the client to schedule an appointment or conduct a WD assessment over the phone.

Individualized Plan Modification

Either a client or a Logan County WD worker may request a modification of the IP. Any modification made will result in a new IP that must have a valid form of signature (see the Definitions Section of this policy) and date by the client. If the client does not agree with the modification, they may request due process through the county and/or State level hearing process. In addition, an updated IP must be completed by the new county of record within 30 days of a county transfer (based on the date of the transfer county code in the statewide automated system). To ensure the clients IP is updated timely following a county transfer, Logan County will immediately contact the client to schedule an appointment or update the IP over the phone. The IP will be updated immediately following the WD assessment. IP modifications or new IPs shall be documented in case comments in the statewide automated system within five business days of the new IP or IP modification date.

Work Activities

Engaged in Work Activities

Work eligible clients are required to engage in the WD program through participation in actions and activities that are selected in partnership with a Logan County worker. All actions and activities in the IP shall relate to the outcome of both initial and ongoing assessments.

The statewide automated system shall accurately reflect all activities that a client is participating in, regardless if that activity is included in the IP. Logan County workers will reference the Work Activity Definition guide to apply and stack appropriate activities (such as a transportation barrier activity with a job search activity). Logan County workers will record activities in the statewide automated system within five business days of the client starting the activity.

Allowable Work Activities

Work activities are defined in greater detail in Colorado's federally approved Work Verification Plan.

Allowable work activities include:

1. Employment, such as full-time or part-time employment, subsidized employment, on the job training, and temporary employment.
2. Education, such as pursuing a degree, high school equivalency, job skills training, English as a second language courses, or pursuing a certificate.
3. Volunteer work, such as community service, work experience programs, and unpaid internships.
4. Search for work, such as applying for jobs, interviewing, attending job fairs, and attending hiring events.
5. Job readiness activities, such as interpreting labor market information, identifying references, building job search skills, building cultural competencies, substance abuse and mental health treatment, mitigating the effects of domestic violence, and rehabilitation activities.

Logan County WD clients are considered to be engaged in WD program requirements if they are participating in any work activity listed above, a barrier activity, or any other work activity in the Work Verification Plan. Clients will report their engagement (number of hours) in a work activity in the month by the end of the following month (with the exception of work activities that allow projecting hours). Logan County workers will reference the Work Verification Plan to allow as much flexibility as possible for the client's engagement reporting method.

Allowable ways to report engagement include:

- Client declaration that is made in writing, such as an email communication, or made verbally with supporting documentation entered into the state's automated system or the client's case file.
 - Examples of client declaration include, but are not limited to: a client declaring how much time is spent on a job application for their job search, a client submitting a timesheet declaring homework hours for an educational activity, or a client providing the number of hours spent in workplace soft skills training at a work experience site. If the number of hours declared by the client falls outside of generally recognized practices, additional substantiation of hours may be warranted.
- Pay stubs, timesheets, tracking sheets, or employer-issued documentation.
- School-issued documentation including progress reports, report cards, and attendance records.
- Interfaced electronic data from a credible source such as the National Directory of New Hires (NDNH).
- Colorado's Department of Labor & Employment Job Bank, also known as Connecting Colorado.

- Collateral contact. For the purposes of substantiating hours, a collateral contact could include worksite supervisors, employers, human resource departments, school officials, or other individuals with firsthand observation or experience with the information that is being verified.
- Projecting participation hours for up to six months at a time (for paid work activities).
- If no other means to substantiate hours exists, PPP, which is the Logan County workers' reasonable judgment of actual hours, can be documented.

The Logan County worker will record a client's program engagement, through the number of hours a client has spent in an activity, in the statewide benefits management system by the end of the business month the hours are due to be reported. If the client turns in the hours within the last week of the data entry month, the case manager will enter the hours within 10 business days.

Fair Labor Standards Act

Logan County WD clients in paid work experience activities shall be entitled to the same wages and benefits, including but not limited to, sick leave, holiday and vacation pay, as offered to employees who are not WD clients and who have similar training or experience performing the same or similar work at a specific workplace. Clients in unpaid work experience activities are entitled to all rules under the Fair Labor Standards Act as indicated in the Work Verification Plan.

Good Cause and Re-engagement

Good Cause

Logan County WD clients may report good cause for not engaging in WD at any time during the current application period. Verification for good cause is not required to be provided by the client. The Logan County worker shall use the prudent person principle to determine good cause which may be reported by the client in person, virtually, telephonically, or electronically. Logan County workers must enter good cause in the state automated system within five calendar days.

Good cause for the client may include, but is not limited to:

- Breakdown in child care arrangements
- Lack of available and appropriate child care
- Remotely located without transportation
- Breakdown in transportation arrangements with no feasible alternative
- School obligations that frequently necessitate a parent's or caretaker's attendance
- Loss of housing or a housing crisis that might result in homelessness or eviction
- Medical emergencies, including mental health, substance abuse, or crisis, involving anyone in the household
- Physical or mental disability or illness of the client or an individual in the clients care
- Legal proceedings for the client or other immediate family members
- Employment issues when layoffs occur, wages are below applicable federal and state minimum wage standards, working conditions present a risk to health or safety, or workers' compensation protection does not exist
- Client's incarceration
- Jury duty
- Death of an immediate family member or authorized representative
- Other situations as determined by the county, to include but are not limited to::
 - Transportation breakdown
 - Inclement weather that causes employer/site closure

Good cause does not constitute an exemption from WD program requirements or time limits. If there is good cause for not participating in the WD program, a sanction or case closure will not be imposed. Logan County will follow the state prescribed process for re-engagement to include good cause, re-engagement, sanctioning, and closing a case.

Even though good cause does not constitute an exemption from the WD program, Logan County workers will consider good cause when granting a program extension. See the Logan County Hardship Extensions policy for more information.

Re-engagement

There may be instances where a client is unable to comply with WD requirements, such as:

- Missing a scheduled meeting
- Not participating with the IP

In these instances, the Logan County worker will send a request for the client to report good cause through the client's preferred method of contact (a phone call, text message, or email) in addition to a written notice sent through the statewide automated system. The client has 11 calendar days to report good cause for being unable to comply with the WD requirements in their IP.

Logan County workers will make every effort to re-engage clients immediately by phone, text, email, in person, or other means available. Re-engaging clients using these methods does not require a new or updated IP and serves as the re-engagement appointment if the client provides a written or verbal waiver that written notice of the scheduled appointment (described below) is not necessary.

Scheduling the re-engagement appointment

At the time of the good cause request, the re-engagement appointment invitation will be sent through the statewide automated system. The client shall be provided written notice of the appointment at least four calendar days, but no more than 11 calendar days in advance.

The written notice shall include:

1. The date and time for the appointment.
2. The opportunity to reschedule the appointment or make other arrangements in the event of good cause.
3. The opportunity for the client to reschedule their re-engagement appointment once. However, the request to reschedule must be made prior to the original re-engagement appointment date and time.
 - a. The rescheduled appointment cannot exceed 15 calendar days from the original re-engagement appointment. Timeframes for rescheduling the re-engagement appointment include:
 - i. The Logan County worker has four calendar days to respond to the client's request to reschedule the re-engagement appointment.
 - ii. After the Logan County worker responds to the reschedule request, and schedules a new re-engagement appointment date, the client shall be provided written notice of the rescheduled appointment within at least four calendar days, but no more than 15 calendar days in advance.

If the client reports good cause, or the Logan County worker determines good cause at any time during the re-engagement schedule process, even after the 11 day calendar period the client has to report good

cause, the re-engagement process ends. The Logan County worker will enter a case comment including the date and type of contact made to determine good cause into the statewide automated system within five business days of determining good cause.

Attending the Re-engagement Appointment

Once the client attends the re-engagement appointment, with or without good cause, the re-engagement process ends. The Logan County worker will conduct an assessment to determine if the client can benefit from supportive payments to re-engage in the program. The Logan County worker or the client may request to modify the IP during the re-engagement appointment, but modifying the IP is not required. The assessment results and any updates made to the IP during the re-engagement appointment shall be documented in the case comments in the statewide automated system within five business days of the re-engagement appointment date.

Missing the Re-engagement Appointment

If the client misses the re-engagement appointment, and makes no attempts to reschedule prior to the scheduled appointment, and the client does not provide good cause, a sanction will be applied to the grant payment and the following process shall occur:

1. The Logan County worker will document the unsuccessful outcomes of the attempts to re-engage the client in the statewide automated system within five business days.
2. A notice of grant payment reduction based on the sanction will be sent.
3. If good cause is provided after the unsuccessful outcome of the re-engagement attempts is entered into the statewide automated system, the sanction shall be reversed.

Exceptional Dis-engagement

If the client attends the re-engagement appointment but does not provide good cause, a sanction will not be imposed, unless the Logan County worker determines that there has been exceptional dis-engagement by the client. Exceptional dis-engagement is evidenced by repetitive or cumulative attendance at re-engagement appointments without reporting good cause. The client's pattern of exceptional dis-engagement must clearly demonstrate repetitive dis-engagement from the program over a span of not more than two months, three consecutive times in one month or four consecutive times in two months. Logan County workers will follow the state prescribed exceptional dis-engagement determination process before applying a sanction.

Sanctions

Effect of a sanction on the grant payment

Logan County workers are responsible for explaining what actions may cause a sanction (see the re-engagement section in this policy), when the client will be subject to a sanction, and the sanction process defined below to all WD clients. This conversation between the Logan County WD worker and client must occur during the review of the Condition Agreement and during all IP modifications. A case comment with a summary and date of the conversation must be entered in the statewide automated system within five business days.

The CW grant payment for the entire household shall be reduced due to a sanction imposed against a member of the assistance unit as follows:

- **First, Second, and Third level sanctions:** The reduction for the first, second, and third instance of sanction shall be 25% of the clients assistance unit's grant payment. The sanction shall be in

effect for one month for each level of sanction. A first, second, or third instance of sanction shall progress to the next level of sanction if the client does not re-engage in the WD program (defined in the re-engagement section of this policy) by the end of the month that the sanction is being served.

- **Fourth level sanction:** The reduction for a fourth level of a sanction is 100% and shall result in a case closure of the grant payment. The closure shall be in effect for one month. A new application for CW grant payments is required if the household would like to receive benefits after the sanction is served.

Serving a sanction

All sanctions imposed by Logan County must be served by the client. If a client has had a break in the grant payment for one month or more, the sanction shall be considered served. If a client reapplies for the CW grant payment anytime within the calendar month that they are serving a sanction, the client must serve the sanction by having a reduction in benefits according to the first, second, or third level sanctions, or by having a case closed for a fourth level sanction.

Sanctioning more than one client in an assistance unit

Each CW case can experience no more than one sanction level in a month. If multiple clients in the same assistance unit have sanctions, the sanctions will be served simultaneously and at the higher sanction level when multiple sanction levels exist.

Re-engagement following a sanction

When a client who is serving a sanction contacts the Logan County worker and indicates an interest in participating in the WD program, an assessment will be conducted and an IP will be developed. Once the IP is signed, the sanction will not progress to the next sanction level unless a new instance of non-compliance occurs. The Logan County worker will enter the re-engagement date into the statewide automated system along with a case comment with the results of the assessment and summary of the IP within five business days of the re-engagement date.

When a client is serving a sanction based on exceptional dis-engagement, the client will be considered re-engaged when they attend a re-engagement appointment.

Appeal of a Sanction

The WD client has the right to appeal Logan County's sanction. The client can utilize the local level dispute resolution process and/or a state level hearing process. The appeal period for proposed sanctions begins with the mailing of a notice of sanction that lists the proposed action and the clients appeal rights.

A notice of proposed action shall not be issued by Logan County for proposed sanctions until the re-engagement process has been completed.

Sanctions from other counties and states

All sanctions shall be served when a client moves from one county to another. The new county may become aware of good cause for previous non-participation and may reverse the sanction if appropriate. Sanctions issued in other states will not be recognized in the State of Colorado.

Workforce Development Outcomes

The Logan County worker is responsible for capturing and recording all client outcomes in the statewide automated system. The worker will check-in with the client at least once every 90 days, and more frequently if needed, to capture outcomes. Outcomes that must be recorded in the statewide automated system are:

- Progress towards goals (such as enrolling in school)
- Job attainment

Logan County workers will make the best effort to capture and record:

- Attainment of a credential or certificate
- Job wage
- Job O*Net Code
- Job title
- Employer name

Signed by:

CHAIR, LOGAN COUNTY BOARD OF COUNTY COMMISSIONERS

DATE



Department of Human Services
POLICY

POLICY TITLE Other Assistance and Supportive Payments	REFERENCE C.R.S. 26-2-706.6; 26-2-709 9 CCR 2503-6
POLICY NO. 06 – CWP	EFFECTIVE DATE April 01, 2022
DIVISION DIRECTOR APPROVAL	BOARD OF COUNTY COMMISSIONERS ADOPTION DATE

BACKGROUND & PURPOSE

Colorado Works (CW) is Colorado's Temporary Assistance for Needy Families (TANF) program. Through the program, clients receive help becoming self-sufficient by strengthening their family's economic and social stability. CW serves as a financial safety net for children and their caretakers. Logan County conducts thorough assessments for the whole family to ensure other assistance and supportive payments are provided for all identified needs.

The purpose of this policy is to provide Logan County workers the guidelines and requirements when administering other assistance or supportive services to clients.

DEFINITIONS

Assessed need - Any identified need of a client or family receiving CW grant payments beyond ordinary, routine living expenses that is designed to deal with a specific crisis situation or episode of need, is not intended to meet recurrent or ongoing needs, and will not extend beyond four months without a new assessment.

Basic Cash Assistance (BCA) - A recurrent cash payment intending to meet ongoing needs.

Client - A current or past applicant or a current or past recipient of a CW grant payment.

Colorado Works - The TANF program in Colorado.

County worker - An employee or designated representative of the county department.

Diversion - A short-term cash payment (not to extend beyond four (4) months) intended to meet an episode of need.

Statewide automated system - The electronic platform used to calculate public assistance program benefits and grant payments.

Supportive payment - A payment and/or service in addition to basic cash assistance or diversion that is based on an assessed need.

Workforce Development (WD) - The program provided to clients determined to be work eligible as described in section 3.607.

POLICY

Logan County provides supportive payments and other assistance to all eligible CW clients in accordance with federal law, state rule, and the guidelines outlined in this policy.

Eligibility

Clients are able to receive supportive payments if they have an assessed need and:

- They are receiving BCA, or
- They received a diversion payment in that month (see the Logan County Diversion Policy), or
- They are a non-custodial parent who needs assistance attaching to or retaining employment who is lawfully present and has annual income under \$75,000.

Assessed Needs

An assessed need is any identified need beyond ordinary, routine living expenses that is designed to deal with a specific crisis situation or episode of need, is not intended to meet recurrent or ongoing needs, and will not extend beyond four months without a new assessment.

Assessed needs may include:

- Paying for school or training programs
- Transportation
- Personal care or clothing
- Housing
- Childcare
- Financial planning and budgeting
- Mediation for non-custodial parents
- Counseling/rehabilitation
- Incentives for goal achievement
- Incentives for gaining and/or maintaining employment
- Special medical needs (family planning, therapy/counseling, and dental services) that are not covered by Health First Colorado
- Any other identified need that will help to stabilize the client or whole family

Logan County will assess non-work eligible families for other assistance and/or supportive payments at each eligibility interview, at minimum. Work eligible clients must be assessed for supportive payments by a county worker at least once every 90 days. The results of an assessment or discussion to identify assessed needs for other assistance and/or supportive payments shall be documented in case comments in the statewide automated system within five business days of the assessment date.

Supportive Payments

Logan County may address assessed needs by issuing supportive payments through the statewide automated system (the Colorado Benefits Management System (CBMS) to the client's Electronic Benefit Transfer account or as a CBMS direct vendor payment, or through other supports offered by community providers. Logan County's other assistance or supportive payments may not exceed \$10,000 in a single payment transaction and \$30,000 per year. Other assistance payments or supportive payments funded through other programs/resources (monetary or not) do not count towards a client's lifetime supportive payment limit. The County Director or the Director's designee has the discretion to override the amount of other assistance or supportive payments issued to a CW client or family.

Clients may request supportive payments at any time through PEAK, the MyCOBenefits application, verbally, or in writing. Logan County shall take action on all other assistance or supportive payment requests within ten calendar days from the date of request by the client or family. All requests for and decisions to approve or deny supportive payments shall be documented in CBMS within five business days.

Clients may appeal supportive payment denial decisions and Logan County will adhere to the county and State's appeal process.

Unallowable Supportive Payments

The below assessed needs are not eligible for supportive payments:

- Medical services (except for family planning, therapy/counseling, and dental services that are not covered by Health First Colorado)
- Needs covered by Title IV of the Social Security Act that supports children in foster care
- Needs of a client's children who are not in the home
- Juvenile justice related services
- Purchase of a capital asset (such as a car, home, investment property, etc.) greater than \$5,000

Logan County will provide resources and referrals to clients who demonstrate these assessed needs but will not issue monetary payments to meet the need.

Referrals

Logan County workers are responsible for connecting CW clients to resources that will help support their long-term economic security, as well as ensuring clients receive appropriate support in a timely manner. The purpose of referrals is to connect clients with various services available within the community, which clients can continue to access after leaving the CW program. Logan County workers shall provide referrals for all families.

Referrals include but are not limited to:

- Housing services
- Transportation assistance
- Client advocacy services
- Prevention and intervention
- Health services, including treatment and therapy
- Domestic violence supports
- Legal services, including mediation
- Food resources

Non-Custodial Parent Supportive Payments

To support the multi-generation framework, Logan County may provide supportive payments listed in this policy, and based on an assessed need to non-custodial parents to assist with obtaining and retaining employment. Non-custodial parents should be able to engage in and pay child support payments as a result of these supportive payments.

When requested, Logan County will provide any external documents, for State review, relating to supportive payments outside of this policy.

Family Services and Child Welfare Non Assistance

To help Logan County residents thrive and to build a better community, Non Assistance payments may be used for a variety of services determined to be in the best interests of the family by child welfare, eligibility, or case management. Services provided to child welfare may advance and sustain the child welfare treatment plan, or prevent a child welfare investigation from becoming an active child welfare case.

Services provided to families known through eligibility or case management help with issues that do not warrant a diversion such as birth certificates, driver's licenses, children's activities that the agency has agreed to provide, etc.

The household must have

- income below \$75000.00 verified by:
 - Attachment A or
 - Application for public assistance or
 - Current CBMS case or
 - IV-E determination or
 - MOE determination
- Be responsible for a child under the age of 18, or a child who is over 18 but will graduate high school before the child's 19th birthday and who is residing in the home
- Be a Logan County resident
- And the recipient of the service must be lawfully present and, if an adult, has signed an Affidavit of Lawful Presence.

Program payments may be used to pay for family services such as, but not limited to:

- Therapies
- Treatments
- Substance abuse monitoring and treatment
- Psychological evaluations
- Interactional evaluations
- Tests
- Supervised visits
- Day treatment
- Life skills
- Parenting or other classes
- Counseling
- Minor remodeling to accommodate individuals with handicaps

- Beds, bedding, and other limited furnishings
- Birth certificates
- Emergency food
- Pest treatment
- Cleaning services
- Home improvements
- Rent
- Deposits
- Mortgage payments
- Paint
- Transportation for employed households
- Clothing
- Child care that would otherwise be paid with county only dollars, or cannot be paid through CHATS
- Activities for children and accompanying adults
- Other items as determined by child welfare or workforce and approved by a supervisor

Signed by:

CHAIR, LOGAN COUNTY BOARD OF COUNTY COMMISSIONERS

DATE



Logan County

Department of Human Services
POLICY

POLICY TITLE Hardship Extensions	REFERENCE C.R.S. 26-2-716(5) 9 CCR 2503-6
POLICY NO. 05 – CWP	EFFECTIVE DATE April 01, 2022
PROGRAM MANAGER APPROVAL	DIVISION DIRECTOR APPROVAL

BACKGROUND & PURPOSE

This policy ensures extensions to Colorado Works grant payments are provided where appropriate and as feasible, within federal and state program guidelines. An assistance unit containing an individual who has received Federal TANF assistance in Colorado or another state(s) as an adult for sixty (60) cumulative months may not be eligible for Federal TANF assistance unless granted an extension by the county department due to hardship.

The purpose of this policy is to establish the criteria for a hardship extension beyond 60 months for Colorado Works.

DEFINITIONS

Assessed need - Any identified need of a client or family receiving CW grant payments beyond ordinary, routine living expenses that is designed to deal with a specific crisis situation or episode of need, is not intended to meet recurrent or ongoing needs, and will not extend beyond four months without a new assessment.

Basic Cash Assistance (BCA) - A recurrent cash payment intending to meet ongoing needs.

Client - A current or past applicant or a current or past recipient of a CW grant payment.

Colorado Works - The TANF program in Colorado.

County worker - An employee or designated representative of the county department.

Diversion - A short-term cash payment (not to extend beyond four (4) months) intended to meet an episode of need.

Statewide automated system - The electronic platform used to calculate public assistance program benefits and grant payments.

Supportive payment - A payment and/or service in addition to basic cash assistance or diversion that is based on an assessed need.

Workforce Development (WD) - The program provided to clients determined to be work eligible as described in section 3.607.

Domestic violence - (also known as family violence) means a pattern of coercive control one individual inflicts upon another in the context of familial, household, or intimate partner (current or former) relationships including marriage and dating. Violence may be inflicted through a variety of means including, but not limited to:

- Physical acts threatening or resulting in physical injury to the individual, including hitting, punching, slapping or biting;
- Intimidation resulting in fear of imminent bodily harm through the use of gestures, displays of weapons, or destruction of property, including pets;
- Threats of or attempts at physical or sexual abuse or other means of coercion and control, including harm to or threats to harm children, other family members, or pets;
- Sexual abuse or threats to inflict nonconsensual sexual acts, including sexual activity with a minor;
- Mental, emotional, or psychological abuse including degradation, constant put-downs, or humiliation that results in a reduced ability to engage in daily activities;
- Isolation from friends, family, or any type of emotional support system;
- Neglect or deprivation of medical care;
- Stalking;
- Economic abuse or control of finances through withholding money or sabotaging attempts to attain economic self-sufficiency; and/or,
- Child molestation, incest.

POLICY

All clients may request an extension when a hardship exists. A client's request for an extension can be made through PEAK, the MyCOBenefits app, verbally, or in writing. Extensions may be granted for up to six months; additional extensions may be granted if circumstances warrant the extension and it is requested prior to the end of the current extension. If a client fails to request an extension on a timely basis, an extension may be granted at the discretion of Logan County.

Eligibility

To receive a Colorado Works hardship extension, the assistance unit must be eligible for basic cash assistance. Assistance units that contain disqualified members (ineligible non-citizens, clients serving Intentional Program Violations (IPVs), fleeing felons, and drug felons who have not completed action towards rehabilitation) are not eligible to receive an extension. Assistance units that contain excluded members (SSI recipients, recipients of other Title IV income etc.) are eligible to be considered for an extension.

Logan County will consider an extension if the client is experiencing a hardship such as disability, legal challenges, family instability, domestic violence, or issues with finding adequate child care, housing or transportation. Logan County will also consider an extension when employment opportunities are inadequate or unavailable due to layoffs in the area, a lack of jobs due to high unemployment rates and poor labor market in the region, working conditions that present a risk to health or safety, or available job opportunities not aligning with the present skillset of the client.

Logan County will consider not only the client's current hardship, but the history of the client's experience with the TANF/Colorado Works program when making a determination to approve or deny a request.

Process

Clients who are approaching the 60-month time limit on Colorado Works assistance receive correspondence through the statewide automated system starting at 55 months. In addition to this automated correspondence, Logan County will make all reasonable efforts to contact clients who may be eligible for an extension by phone or in person to explain the extension process and to accept a request for an extension. When an extension is requested, Logan County will make a reasonable effort to gather any additional information about the client's situation required to make a decision.

All extension requests must be data entered into CBMS. In Logan County, the decision to approve or deny a hardship extension is made by the Workforce Development Program Manager, and Logan County will make a determination to grant or deny the extension within 30 days of receiving the client's request. Written notification of the approval or denial will be issued through CBMS.

Clients who receive a denial of an extension request have the right to appeal and request continued benefits. Clients who are receiving continued benefits after the denial of a hardship extension request and continue to work with a case manager may receive supportive payments at Logan County's discretion according to the Logan County Other Assistance and Supportive Payments Policy.

Logan County must work with clients to develop a plan to address the causes of the extension. This may include goals that are part of a client's Individualized Plan, action items to connect with county and community supports, and any other guidance that would be beneficial to stabilize the household. The desired outcome of the plan is for the client to transition off of Colorado Works at the end of the hardship extension.

County Utilization of Hardship Extensions

Up to 20% of the statewide Colorado Works caseload may be granted an extension beyond the 60-month lifetime limit due to hardship. The State of Colorado will notify counties if a concern is identified with nearing the 20% caseload limit, and if such a concern has not been identified, Logan County will consider all requests for hardship extensions without regard to limiting the number of cases that are granted extensions.

Signed by:

CHAIR, LOGAN COUNTY BOARD OF COUNTY COMMISSIONERS

DATE



Logan County

Department of Human Services
POLICY

POLICY TITLE Diversion	REFERENCE C.R.S. 26-2-706.6 9 CCR 2503-6
POLICY NO. 03- CWP	EFFECTIVE DATE April 1, 2022
DIVISION DIRECTOR APPROVAL	BOARD OF COUNTY COMMISSIONERS ADOPTION DATE

BACKGROUND & PURPOSE

Logan County recognizes that families may have immediate and short-term needs for financial assistance that, if met, can quickly stabilize the family/assistance unit, thereby diverting a need for ongoing cash assistance. In order to meet these needs in the community, Logan County provides a diversion cash assistance program for qualified families.

The purpose of this policy is to identify the eligibility and suitability criteria for diversion payments, outline programmatic components associated with such payments, and establish a period of ineligibility for receiving ongoing cash assistance, barring hardship, once diversion has been issued. Maximum dollar thresholds are also established in this policy.

A diversion payment is a needs-based, cash payment designed to meet short-term needs. Payments are designed to address specific crisis situations or episodes of need and are not designed to meet basic ongoing needs.

DEFINITIONS

Assessed need - Any identified need of a client or family receiving CW grant payments beyond ordinary, routine living expenses that is designed to deal with a specific crisis situation or episode of need, is not intended to meet recurrent or ongoing needs, and will not extend beyond four months without a new assessment.

Basic Cash Assistance (BCA) - A recurrent cash payment intending to meet ongoing needs.

Client - A current or past applicant or a current or past recipient of a CW grant payment.

Colorado Works - The TANF program in Colorado.

County worker - An employee or designated representative of the county department.

Diversion - A short-term cash payment (not to extend beyond four (4) months) intended to meet an episode of need.

Statewide automated system - The electronic platform used to calculate public assistance program benefits and grant payments.

Supportive payment - A payment and/or service in addition to basic cash assistance or diversion that is based on an assessed need.

Workforce Development (WD) - The program provided to clients determined to be work eligible as described in section 3.607.

POLICY

In Logan County, diversions are made when:

- There is no need for ongoing support to meet the identified need,
- There is no need for extensive case management or services, and
- The payment is expected to substantially promote or maintain an assistance unit's economic well-being.

Logan County provides cash diversion payments not to exceed \$10,000 total per assistance unit to eligible and suitable clients based upon an established need, in conjunction with the determination that the need is not expected to be ongoing.

Eligibility

To receive a diversion payment, non-financial eligibility criteria for basic cash assistance (BCA) must be met such that the assistance unit could receive a BCA grant payment as determined by the statewide automated system. As is required to receive BCA, the assistance unit must contain an eligible child or pregnancy, and provide for the needs of clients who are lawfully present in order to receive a diversion. (A diversion may be paid to an assistance unit in which only a child is lawfully present.)

Assistance units whose countable income meets the BCA income guidelines (needs standard) may be eligible for a diversion payment. In Logan County, diversion can be issued to assistance units whose countable income exceeds the needs standard and is less than \$75,000 annually.

Assessment, Need and Suitability

Logan County assesses members of the assistance unit at the time of a Colorado Works application and at other relevant times to identify whether BCA or diversion is the most beneficial program for the client. In addition to identifying whether the client would be better served by BCA or diversion, the purpose of the assessment is to identify the needs of the client, and whether diversion is suitable to meet the short-term needs of the client such that they will be able to meet their long-term economic security goals. Assessment for diversion may take place through informal discussion during the eligibility interview and is not required to take place using a specific form. Case comments must identify that diversion was considered, and reasons why BCA or diversion was determined to be the most appropriate option for assistance.

A diversion assistance unit must demonstrate a specific short-term need which, if met, will stabilize the assistance unit, and is likely to ensure long-term economic well-being.

The following criteria must be established:

- The client does not need long-term cash assistance.

- The client demonstrates a specific short-term need. (The estimated cost of the need may be established without external verification by accepting a client declaration determined to be reasonable according to the Prudent Person Principle.)
- The client must have a plan to be able to support themselves ongoing if the one-time crisis situation can be resolved.

If the client has a specific short-term need, but a diversion payment is not determined to be suitable for the client, Logan County will continue to determine eligibility for BCA and issue supportive payments to the client in accordance with the Logan County Supportive Payment policy.

Period of Ineligibility

When a diversion is issued, a client may not receive BCA for a period of time referred to as a period of ineligibility (POI). For this reason, prior to issuing a diversion payment, Logan County will determine that ongoing support to meet the need is not anticipated. The POI begins on the first day of the month in which the diversion payment is provided. Clients who receive a diversion payment must agree to a POI.

The POI may be waived if there is an identified hardship. Hardship for this purpose is defined as an unforeseen, unexpected and otherwise unmanageable event or crisis.

Logan County uses the following guidelines to determine the POI for a Diversion Payment:

The following formula will be used to determine POI.: Diversion payment divided by the BCA amount for family size rounded down to the nearest whole month

The length of a POI may not exceed the length of time it would have taken the client to receive the equivalent of the diversion payment in BCA.

Payment

Diversion payments will be made through CBMS. A diversion payment may not exceed \$10,000 per assistance unit. The actual payment amount of each diversion will be based on the client's estimated need. A diversion payment will not be issued in an amount that is less than the client would receive in BCA during the time period of the POI.

The County Director or designee has the discretion to override the amount of a diversion if a hardship exists. In Logan County, the County Director designates override decisions to the Workforce Programs Manager.

In addition to diversion payments, eligible clients may receive supportive payments based on the assessed needs of the assistance unit. After a diversion payment has been issued to a client, the client shall not be asked to verify how the funds were spent.

Allowable Use of Funds

Diversion assistance may be used to assist clients with any short-term need identified by Logan County which, if met, will help to alleviate the client's identified barriers to employment or economic well-being, except for the following needs:

- Medical services (except for family planning, therapy/counseling, and dental services that are not covered by Health First Colorado).
- Needs covered by Title IV of Social Security Act that supports children in foster care.

- Needs of a client's children who are not in the home.
- Juvenile justice related services.
- Purchase of a capital asset (such as a car, home, investment property, etc.) greater than \$5,000.

In addition to these needs, Logan County will not provide diversion payments to cover anything other than:

- Rent, Deposits, House Payments
- Utilities
- Vehicle Repair
- Any other identified need that will help to stabilize the client or family

Terms

Prior to issuing a diversion payment in Logan County, a discussion takes place with the client to establish the following:

- The reason why ongoing cash assistance is not a need.
- The client understands and agrees to the POI.
- The possible impacts on other assistance, including the loss of categorical eligibility for SNAP, transition to low income childcare through the Colorado Child Care Assistance Program, and any other programs the client may benefit from through other agencies.

The discussion shall be documented through comments in the statewide automated system within five business days of the date of the diversion discussion.

Signed by:

CHAIR, LOGAN COUNTY BOARD OF COUNTY COMMISSIONERS

DATE



Logan County

Department of Human Services
POLICY

POLICY TITLE Disaster Assistance	REFERENCE C.R.S. 26-2-137; 26-2-703; 26-2-706.6 9 CCR 2503-6
POLICY NO. 02 – CWP	EFFECTIVE DATE April 1, 2022
DIVISION DIRECTOR APPROVAL	BOARD OF COUNTY COMMISSIONERS ADOPTION DATE

BACKGROUND & PURPOSE

In cases of a county, state or presidentially (federally) declared emergency or disaster, families may have immediate and short-term needs for financial assistance to resolve financial crises caused by the disaster. In order to meet these needs in the community, Logan County provides a Disaster Assistance program for qualified clients.

This Disaster Assistance policy is in effect only when a county, state or presidential-level disaster has been declared and Logan County has made the decision to activate this policy.

DEFINITIONS

Assessed need - Any identified need of a client or family receiving CW grant payments beyond ordinary, routine living expenses that is designed to deal with a specific crisis situation or episode of need, is not intended to meet recurrent or ongoing needs, and will not extend beyond four months without a new assessment.

Basic Cash Assistance (BCA) - A recurrent cash payment intending to meet ongoing needs.

Client - A current or past applicant or a current or past recipient of a CW grant payment.

Colorado Works - The TANF program in Colorado.

County worker - An employee or designated representative of the county department.

Diversion - A short-term cash payment (not to extend beyond four (4) months) intended to meet an episode of need.

Statewide automated system - The electronic platform used to calculate public assistance program benefits and grant payments.

Supportive payment - A payment and/or service in addition to basic cash assistance or diversion that is based on an assessed need.

Workforce Development (WD) - The program provided to clients determined to be work eligible as described in section 3.607.

POLICY

Activation of the Policy

When a county, state, or presidential level disaster is declared, Logan County will determine whether or not to activate this Disaster Assistance policy based on the impact of the particular disaster in Logan County and available resources. If Logan County decides to activate this policy, the County Director or other designated individual will contact the Employment and Benefits Division (EBD) at CDHS_EmplBenDiv@state.co.us to request Disaster Assistance functionality in CBMS to be turned on for Logan County. Disaster payments may be requested while a disaster declaration and associated CBMS functionality is active. Disaster payments may also be requested through the end of the month in which the disaster declaration is rescinded. In cases where latent effects of the disaster appear after the disaster declaration is rescinded, the client may petition for assistance. Assistance will be granted at the County Director's (or other designated individual's) discretion.

Process

Requests for Disaster Assistance are made using state prescribed Public Assistance application methods for Colorado Works. A screening form may be used to differentiate Disaster Assistance requests from requests for ongoing Colorado Works grant payments. Logan County will put forth every effort to streamline processes and remove barriers that could prevent clients from accessing cash assistance during a disaster.

When a disaster is state or presidentially declared, normal Colorado Works verification requirements are waived (with the exception of lawful presence) by the declaration of an emergency and the declaring authority's direct action to suspend certain regulatory statutes. When a disaster is county-declared, verifications normally needed to approve Colorado Works will still be required to approve a Disaster Assistance payment.

Eligibility

As is required to receive Basic Cash Assistance (BCA), the assistance unit must contain an eligible child or pregnancy, and provide for the needs of clients who are lawfully present in order to receive a disaster payment. (A disaster payment may be paid to an assistance unit in which only a child is lawfully present.) Countable annual income must be below \$75,000.

The client's needs must have been caused or exacerbated by the disaster situation. Clients will not be asked to provide proof of their needs in order to receive Disaster Assistance.

At the County Director's (or other designated individual's) discretion, assistance may be provided to a client who is currently under sanction or disqualification status for Colorado Works.

Payment

Payments will be made through the Colorado Benefits Management System (CBMS). Disaster payments may be issued through Diversion or Supportive Payment functionality.

A disaster payment may not exceed \$10,000 per assistance unit per disaster. The actual amount of each disaster payment will be based on the client's actual estimated need.

Payment of Disaster Assistance funds will not affect any lifetime maximums on regular Diversion or Supportive Payment limits that are identified in other county policies and a period of ineligibility (POI) will not be imposed after a disaster payment is made.

Payments will be issued on an EBT card (or via the Key Bank card or direct deposit if the client has previously set up these payment options). After a Disaster payment has been issued to a client, the client shall not be asked to verify how the funds were spent.

Allowable Use of Funds

Disaster Assistance may be used to assist clients with any short-term need identified by Logan County that is related to the declared disaster, except for the following needs:

- medical services (except for family planning, therapy/counseling, and dental services that are not covered by Health First Colorado),
- needs covered by Title IV of Social Security Act that supports children in foster care,
- needs of a client's children who are not in the home,
- juvenile justice related services,
- purchase of a capital asset (such as a car, home, investment property, etc.) greater than \$5,000.

Deactivation of the Policy

Logan County will email EBD at CDHS_EmplBenDiv@state.co.us to request Disaster Assistance functionality to be turned off due to the end of a county declared disaster or the decision to stop offering Disaster Assistance in Logan County while a state or presidentially declared disaster continues. When a state or presidential-level disaster declaration ends, Logan County will stop making disaster payments by the end of the month in which the declaration is rescinded. (If Logan County wishes to continue operating Disaster Assistance after a state or presidential-level disaster declaration ends, a county-level disaster may be declared and the policy may be re-activated.)

Signed by:

CHAIR, LOGAN COUNTY BOARD OF COUNTY COMMISSIONERS

DATE



Logan County

Department of Human Services
POLICY

POLICY TITLE County Approved Settings	REFERENCE C.R.S. 26-2-706.6; 26-2-709 9 CCR 205-6
POLICY NO. 01 – CWP	EFFECTIVE DATE April 01, 2022
DIVISION DIRECTOR APPROVAL	BOARD OF COUNTY COMMISSIONERS ADOPTION DATE

BACKGROUND & PURPOSE

The Colorado Works program allows for minor parents to receive grant payments on behalf of their own children. Before approving grant payments for minor parents who are not married, emancipated, living with an adult relative or in the care of another adult who is responsible for them, Logan County must identify that the minor parent resides in a “county approved setting.”

Logan County evaluates that the minor parent’s living situation is appropriate in order to ensure the health and safety of minor children, and to ensure appropriate supports are provided to minors who do not have a suitable place to live. Living arrangements deemed appropriate according to this policy constitute an approved setting for the Colorado Works program.

The purpose of this policy is to outline the process that Logan County follows to evaluate whether a minor parent resides in an appropriate place and is connected to necessary supports and services available in the community and through Logan County. The policy will also outline steps that will be taken to find an appropriate living arrangement for the minor parent and their child(ren) if their initial situation is not identified as appropriate.

DEFINITIONS

Assessed need - Any identified need of a client or family receiving CW grant payments beyond ordinary, routine living expenses that is designed to deal with a specific crisis situation or episode of need, is not intended to meet recurrent or ongoing needs, and will not extend beyond four months without a new assessment.

Basic Cash Assistance (BCA) - A recurrent cash payment intending to meet ongoing needs.

Client - A current or past applicant or a current or past recipient of a CW grant payment.

Colorado Works - The TANF program in Colorado.

County worker - An employee or designated representative of the county department.

Statewide automated system - The electronic platform used to calculate public assistance program benefits and grant payments.

Supportive payment - A payment and/or service in addition to basic cash assistance or diversion that is based on an assessed need.

Workforce Development (WD) - The program provided to clients determined to be work eligible as described in section 3.607.

POLICY

Population

A county approved setting is required for a minor parent (or pregnant minor) who is under the age of eighteen and is the head of household on a Colorado Works case and:

1. Does not live with another adult who exercises responsibility for the minor parent's care and well-being,
2. Does not live with an adult relative,
3. Is not emancipated, and
4. Is not/has never been married.

When a minor parent does reside with a parent or another caretaker who exercises responsibility for them, the minor may not receive assistance as an adult and the head of household in their own case. They will be paid as a child in an assistance unit with their parent or caretaker as the head of household. (A non-parent caretaker does not have to receive Colorado Works grant payments on behalf of themselves). In this scenario a county approved setting is not required.

Evaluation Process

When a minor parent must have a county approved setting evaluated, Logan County will take the following steps:

The Colorado Works eligibility worker will notify the designated county department / individual of the need for evaluation of a county approved setting.

1. The eligibility worker will provide the name, address and contact information for the minor parent.
2. The designated county department/individual will:
 - a. Contact the minor parent to discuss their living situation.
 - b. Conduct a home visit, if the contact with the minor parent alone is not deemed sufficient to determine whether the situation is appropriate,
3. For a setting to be determined appropriate in Logan County, the minor parent's living arrangements must consist of a dwelling that is designed for human habitation and is free from anything that may endanger the health or welfare of the minor child(ren) or parent.
4. Provide appropriate resources and referrals to the minor parent as identified in the Referrals section.
5. Notify the eligibility worker if the setting is determined appropriate (a.k.a. approved) or data-enter the information into CBMS directly.
6. If the setting is not yet approved, the designated county department/individual will work with the client to establish an appropriate setting, and communicate progress with the eligibility worker.

Unapproved Settings

Logan County may determine that a setting is inappropriate and therefore not an approved setting, and in these situations, Logan County will take the following steps to ensure that the minor parent and their child are able to relocate to an approved setting:

1. Together with the minor parent, discuss options of places to live which would be safe and supportive for the minor and their child(ren) such as living with a parent, legal guardian or other appropriate adult relative.
2. If living with a parent, guardian or adult relative is not a safe or supportive option, Logan County will discuss with the minor parent whether there are any other trusted adults who might provide a safe and supportive environment to live.
3. If no informal living arrangements with a safe and trusted adult are suitable, Logan County will provide, or assist the client in locating, a second chance home (adult-supervised, supportive group homes or apartment clusters for teen mothers and their children who cannot live at home because of abuse, neglect or other extenuating circumstances), maternity home (a form of supportive housing provided to pregnant women), or other appropriate adult-supervised supportive living arrangement, taking into consideration the needs and concerns of the individual. **Logan County does not have anything like this. I would like this paragraph struck from our policy**
4. If the change in living arrangement significantly alters the client's circumstances, updates may be required to the Colorado Works case, or the minor parent may choose to withdraw their request for Colorado Works.

If child abuse or neglect is suspected or uncovered when evaluating whether a minor parent resides in an appropriate setting, Logan County will make referrals to Child Welfare by calling the Child Abuse and Neglect Hotline (1-844-CO-4-KIDS) in accordance with Mandatory Reporter requirements.

Referrals

Logan County staff are responsible for connecting clients to resources that will help support their long-term economic security, as well as ensuring clients receive appropriate support in a timely manner. The purpose of referrals is to connect clients with various services available within the community. Referrals include but are not limited to:

- advocacy (such as domestic violence advocacy)
- counseling
- prevention and intervention
- mediation services
- physical and mental health services
- substance abuse counseling
- legal services
- food banks
- housing

Signed by:

CHAIR, LOGAN COUNTY BOARD OF COUNTY COMMISSIONERS

DATE