



LARIMER COUNTY WORKS POLICY

Title:	24 Month Clock County Defined Activities Policy		
Effective Date:	7-1-99	Page: 1 of	6
Desk:	EC and FAP	Revision:	3-17-02
Reference:	LCWC P&P 02-129	BCC Approval on:	7-12-00
Agency Letters:			
Regulations:	3.621		

BACKGROUND:

The Colorado Welfare Reform legislation, in response to the federal Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), established the Temporary Assistance to Needy Families (TANF) program. The Colorado program, named the Colorado Works Program, defines the 24-month requirement in Volume III (3.625). In accordance with these welfare reform regulations, an adult participating in the Colorado Works program is required to be in a county-allowable activity by the end of 24 cumulative months and for each month of cash assistance participation thereafter.

On the evening of the 15th of every month, the state's CACTIS and COIN systems will automatically match the CACTIS activity and COIN status to the TANF 24-month clock. The system will automatically change the TANF case to a Medicaid-only case if the matched participant is at the TANF clock month 24 or greater and is not in a county-allowable activity. Therefore, for all practical purposes, the TANF case closes and the household is no longer eligible for cash assistance.

POLICY:

It shall be the policy of the Larimer County Works program that eligible participants for the TANF program shall be in compliance with the regulations requiring an adult on TANF to be in a county-allowable activity by the end of the 24th month. For TANF months 25-60, the participant must participate a minimum of one hour in a county-allowable activity, as agreed upon in the Individual Responsibility Contract (IRC), or as listed in the Larimer County Policies.

A participant must be in at least one county-allowable activity in CACTIS on the 15th of the month in order to meet the 24-month requirements. These allowable activities include:

- | | |
|--------------------------------------|------------------------------------------|
| AS - Assessment/IRC | JS - Job Search/Job Readiness Activities |
| BE - Basic Education | JT - Job Skills Training |
| CC - Childcare for Community Service | OT - On the Job Training |
| CO - County Option * (Defined later) | PE - Pending IRC Activity |
| CP - Community Work Experience | PS - Post secondary Education |

CS - Community Service
CU - Cure
ES - English as a Second Language
GD - GED
HS - High School
JE - Full-time Unsubsidized Employment

PT - Part-time Unsubsidized Employment
PW - Alternative Work Experience
SK - Employer Specific Vocational Education
TT - Temporary Employment
WO - Work Study
WS - Work Supplementation/Private Sector
WT - Work Supplementation/Public Sector

After May 28th, 1999, the CO activity code will be used instead of HO for all participants who meet the requirements of reason codes 01 through 99, with the exception of HO reason code 12 for non-cooperation.

Note: If a participant is at 25-60 months of TANF and enters into the Intervention/Failure to Cooperate process, then the 24 Month Clock and the Intervention/Failure to Cooperate processes will operate concurrently. However, the Intervention/Failure to Cooperate activities outlined and agreed to on the Intervention and/or Compliance IRC(s) may supersede the one hour activity requirement as outlined in the 24-Month Clock/County Defined Activities Policy. Refer to the Intervention/Failure to Cooperate policy for more specific guidance.

Additional Guidance:

Larimer County has adopted the following as county-defined options for purposes of counting participants under the 24-month requirements. County Option (CO) components are allowable activities and do not count toward the participation rate of the county. County Option (CO) will be used instead of HO (Hold) for participants who cannot actively participate until an issue(s) is resolved. Participants who are not in a county defined component, or whose status is unknown, will be coded CN (Conciliation), SA (Sanction), or AU (Unsatisfactory Assessment).

The Employment Coach, the Participant Assessment Specialist, and/or the Eligibility Technician may use a CO-coded hold without approval from the Quality Assurance Committee (QAC) for a period of up to two months. Use of these codes for greater than two months, other than the one-time 12 weeks allowed for maternity/postpartum care, must be submitted to QAC for review and approval prior to the end of the 2 month coach-approved hold.

Definitions:

- A) County-Allowable Activity: For 24-month purposes, this is included under the definition of county-defined work activities. Since not all activities are “work” activities, it is used to refer to those activities that are county “approved”.
- B) County Option* - County defined activities under County Option shall be for the following reasons:

01 Postpartum:

Enter in CO for 12 weeks from the birth of the child. A participant who is at 25-60 months of TANF assistance will be provided 6 weeks of post-partum and will not be expected to participate in an activity. The participant will be expected to participate in activities during the second 6 week timeframe.

These activities may include, but are not limited to, searching for childcare, attending childcare selection, career exploration, or parenting workshops, participating in literacy activities, mental health support/therapy, transitioning to LCWC activities, or other activities as determined by the Employment Coach. If the participant is not able to participate in activities for the second 6 week timeframe, then a request to the Quality Assurance Committee must be submitted for review.

02 Medical/Substance Abuse:

Enter in CO for 2 months and complete the documentation required for referral to Quality Assurance Committee (QAC).

03 Mental Health Counseling:

If the mental health issue is so pervasive that the participant is not able to participate in any activity, then the Employment Coach shall enter CO for a period of time not to extend beyond two months. If the hold extends past two months, then the Employment Coach shall complete the documentation required for referral to the Quality Assurance Committee (QAC).

For the first 0-6 months – Counseling may be the only activity if QAC approved.

For the next 7-48 months – Must have 5 hours of participation under a CS component and/or any other appropriate activity. Refer to Community Service Policy and Procedures for more specific guidance.

For the next 10-12 months – Must have 10 hours of participation under a CS component and/or any other appropriate activity. Refer to Community Service Policy and Procedures for more specific guidance.

For the next 13-15 months – Must have 15 hours of participation under a CS component and/or any other appropriate activity. Refer to Community Service Policy and Procedures for more specific guidance.

For the next 16-18 months – Must have 20 hours of participation under a CS component and/or any other appropriate activity. Refer to Community Service Policy and Procedures for more specific guidance.

For the next 19-21 months – Must have 25 hours of participation under a CS component and/or any other appropriate activity. Refer to Community Service Policy and Procedures for more specific guidance.

For the next 22-25 months – Must have 30 hours of participation under a CS component and/or any other appropriate activity. Refer to Community Service Policy and Procedures for more specific guidance.

For the next 26-48 months – Must have full participation.

04 Court Related/Child Protection:

If the court related/child protection issues are so pervasive that the participant is not able to participate in any activity, then the Employment Coach shall enter CO for a period of time not to extend beyond two months. If the hold extends past two months, then the Employment Coach shall complete the documentation required for referral to the Quality Assurance Committee (QAC).

05 Homeless/Housing:

If the homeless/housing issues are so pervasive that the participant is not able to participate in any activity, then the Employment Coach shall enter CO for a period of time not to extend beyond two months. If the hold extends past two months, then the Employment Coach shall complete the documentation required for referral to the Quality Assurance Committee (QAC).

06 Transportation:

If the transportation issues are so pervasive that the participant is not able to participate in any activity, then the Employment Coach shall enter CO for a period of time not to extend beyond two months. If the hold extends past two months, then the Employment Coach shall complete the documentation required for referral to the Quality Assurance Committee (QAC).

07 Domestic Violence:

Complete the documentation required for an immediate referral to the Quality Assurance Committee (QAC).

08 Vocational Rehabilitation:

If the involvement with Vocational Rehabilitation is such that the participant is not able to participate in any activity, then the Employment Coach shall enter CO for a period of time not to extend beyond two months. If the hold extends past two months, then the Employment Coach shall complete the documentation required for referral to the Quality Assurance Committee (QAC).

09 SSI:

If the issues that require an application to SSI, including application, obtainment of medical information, and the appeal process, are so pervasive that the participant is not able to participate in any activity, then the Employment Coach shall enter CO for a period of time not to extend beyond two months. If the hold extends past two months, then the Employment Coach shall complete the documentation required for referral to Quality Assurance Committee (QAC).

10 Childcare Unavailable/ Child Under 6 Years of Age:

In the event that a participant is unable to secure childcare, in accordance with State Agency Letter TCW-99-35-A, then the Employment Coach will seek verification from the Women's Center that the participant has actively pursued the available childcare options. The Employment Coach will request that the Women's Center, based on their experience and expertise, provide their professional opinion regarding the availability of childcare for the participant. The Employment Coach shall complete the documentation required for referral to the Quality Assurance Committee (QAC).

13 Appeal:

In the event that a participant appeals the number of months he/she received cash assistance due to a 24 month closure, the Employment Coach will place them in a CO code 13 until the issue is resolved.

99 Other:

If the situation is such that the participant is not able to participate in any activity, then the Employment Coach shall enter CO for a period of time not to extend beyond two months. Situations include, but are not limited to, (1) participant situation does not fall under one of the other county-approved categories; (2) participant may not be able to actively participate due to system transfer processes (i.e., the time between applying for TANF and being matched with an Employment Coach); and (3) other situations as defined by QAC and/or the Child Support "Good Cause" Committee. If the hold extends past two months, then the Employment Coach shall complete the documentation required for referral to the Quality Assurance Committee (QAC).

Note: The following components will not meet work activity requirements unless one of the previously listed components was also active within the first 15 days of the month:

AU – Unsatisfactory Assessment	ER - IRC Review
CD – County Diversion	HO - Holding
CN – Conciliation	OR - Orientation
CM – Case Management	SA - Sanction
DI – State Diversion	

- C) **TANF Closures:** As per Agency letter TCW 98-22-1, if a participant fails to meet their county-allowable activity requirements after 24 cumulative months on TANF, the TANF case will automatically close on the 15th of the month. In order to re-establish eligibility for TANF, the participant needs to contact their Technician or Coach, and be in a county-allowable activity for a minimum of one hour. (See Larimer County Works Intervention/Failure to Cooperate Policy and Procedures 3.621.22, TCW 98-20-P & TCW Q and A.)

SCOPE:

Applies to TANF participants and Larimer County's 24-month clock requirements.

DEPARTMENTS AFFECTED:

- The Larimer County Workforce Center (LCWC): Skills Assessment and Fiscal Teams.
- Larimer County Department of Human Services: Developing Independence Division (DID), and Administrative Support Services.

REFERENCES:

- The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PL104-193), enacted August 22, 1996.

- Agency letters TCW98-22-I, dated 8/28/98; TCW98-29-I, dated 10/20/98; TCW 98-30-I, dated 11/16/98; and through The State's teleconference held on January 13th, 1999.
- LCWC Policy numbers:
 - ◆ P & P 02-101 (Other Work Activities)
 - ◆ P & P 02-104 (Two-Parent Households)
 - ◆ P & P 02-106 (Countable Community Service Activities)
 - ◆ P & P 02-110 (Work Experience - Coding Information)
 - ◆ P & P 02-112 (Self-Employment)
 - ◆ P & P 02-114 (Domestic Violence)
 - ◆ P & P 02-117 (Definition of Sanctions)
 - ◆ P & P 02-119 (Job Readiness)
 - ◆ P & P 02-126 (Advance Works Referral)
 - ◆ P & P 02-028 (intervention/Failure to Cooperate)

APPLICABLE FORMS/REPORTS:

- State report number ECJTEOA-205 (Colorado Works TANF Clock Counts for Participants not in County Defined Work Activity).
- State report number ECJTECA-203 (Current Clock Tick Register), CACTIS SPA screen number 15 - Participant Detail (PF8) shows average weekly hours
- CACTIS screen number 03 (Entry Screen for Works Components)
- Individual Responsibility Contract (IRC)
- Notice of Action (SMR-3)
- State Letter to Participant Referencing Current Clock Tick Register.