



LARIMER COUNTY WORKS POLICY

Title:	County Defined Allowable Work Activities		
Effective Date:	12/11/03	Page: 1 of	6
Desk:	EC and FAP	Revision:	2
Reference:	LCWC P&P	Approval on:	12/11/03 Riley/Friedman
Agency Letters:			
Regulations:			

1.0 Policy:

It shall be the policy of the Larimer County Works program to utilize county defined options. County Option (CO) components are allowable activities but these activities do not count toward the work participation rate of the county. CO will be used instead of HO (Hold) when participants are not able to actively participate in federally countable components as outlined in this policy. Participants who are not participating in an approved activity shall be coded CN (Conciliation).

County Defined Activities Under County Option (CO) Shall Be Used As Follows:

The Employment Coach, 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 for any of the defined categories. Use of this code for greater than two months, other than the one-time 12-week postpartum hold for maternity/postpartum care, must be submitted to QAC for review and approval **prior to the end of the two-month coach-approved hold.**

If the issue is expected to continue beyond two months, the employment coach shall prepare the required documentation for submission to the Quality Assurance Committee (QAC) for review as per the Works Internal Guidelines Quality Assurance Guidelines. These steps should be taken as soon as it is determined that the need for a hold will most likely extend beyond two months.

It is the intent of LCWC not to put a participant in the hold status if they can participate with reasonable accommodations.

2.0 Scope:

These guidelines outline the county defined activities under the County Option (CO) component in Larimer County and give guidance as to how this component is to be used.

3.0 Departments Affected:

- Larimer County Workforce Center (LCWC): Larimer County Works Center.
- Larimer County Department of Human Services (LCDHS): Benefits Planning Division (BPD).

4.0 References:

- The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PL 104-193), enacted August 22, 1996.
- CACTIS Manual
- Federal Register, 28 CFR Part 25, Part IV, Dept of Justice, Nondiscrimination on the Basis of Disability in State and Local Government Services; Final Rule
- Americans with Disabilities Act, Public Law 101-336

5.0 Applicable Forms:

- Quality Assurance Committee Hold Request Form
- Work Status Report
- Individual Responsibility Contract
- Works Internal Guidelines – Quality Assurance Requests

6.0 Definitions:

A. County-Allowable Activity: This term is used to refer to Larimer County's county defined work activities. Because not all activities are "work" activities, it is used to refer to those activities that are "county approved". These "county approved" activities also meet the purposes of the 24-month clock requirements.

B. County Option: County defined activities under County Option shall be used for the following reasons:

Postpartum: When a participant has not yet reached month 25 of TANF cash assistance, and has not used this exemption before while receiving TANF cash assistance, the participant may receive a hold for 12 weeks from the birth of a child. If a participant is not able to participate in countable activities after the 12-week postpartum period, a request for extension must be submitted to the Quality Assurance Committee (QAC) for review and approval of an additional hold.

Note: A 6-week postpartum hold shall be provided to any participant who gives birth to more than one child during their initial 24 months on TANF cash assistance and has already used the 12-week exemption and/or to any participant who is beyond 24 months of TANF cash assistance.

The participant will not be expected to participate in an activity during the postpartum time period. The participant will be expected to participate in activities once the postpartum timeframe is used. These activities may include, but are not limited to: searching for child care, attending child care selection, career exploration, or parenting workshops; participating in literacy activities and/or mental health support/ therapy; transitioning to LCWC activities and/or other activities as determined by the Employment Coach. If the participant is not able to participate in activities once the postpartum period is used, a request to the Quality Assurance Committee must be submitted for review and approval of an additional hold.

Medical or Substance Abuse: When medical, maternity, or substance abuse issues prevent the participant from participating in countable activities, even with accommodations.

Mental Health Counseling: When mental health issues are so pervasive that the participant is not able to participate in countable activities even with accommodations.

Court Related or Child Protection: When court related/child protection issues are so pervasive that the participant is not able to participate in a countable activity.

Homeless or Housing: When homeless/housing issues are so pervasive that the participant is not able to participate in a countable activity.

Transportation: When transportation issues are so pervasive that the participant is not able to participate in a countable activity.

Domestic Violence: When participation in countable activities is not a realistic goal due to domestic violence issues, the Employment Coach shall complete the documentation required for an immediate referral to the Quality Assurance Committee (QAC). See the Larimer County Works Policy titled "Domestic Violence" for further information and details.

Vocational Rehabilitation: When involvement with Vocational Rehabilitation is such that the participant is not able to participate in a countable activity.

SSI Application: When presenting issues require an application to SSI and are so pervasive that the participant is not able to participate in a countable activity, even with an accommodation. These issues include,

but are not limited to: application, obtainment of medical information, and the appeal process.

Childcare Unavailable for Child Under 6 Years of Age: When a participant is unable to secure child care, in accordance with State Agency Letter TCW-99-35-A.

Caring for Severely Disabled Child: When a participant is responsible for caring for a severely disabled child and is not able to participate in a countable activity.

Appeal 24-Month Clock Closure: In the event that a participant appeals the number of months he/she received cash assistance due to a 24-month closure, and the participant is not able to participate in countable activities, the employment coach will code the participant as a CO13 until the issue is resolved. These situations do NOT need to be reviewed by the QAC even if the resolution period exceeds two months.

Other: When a participant is unable to participate due to a situation not described above. These situations include, but are not limited to: (1) participant situation does not fall under one of the other county countable categories; (2) participant may not be able to actively participate due to system transfer processes (i.e., during transition of a case to a different coach); and (3) other situations as defined by QAC and/or the Child Support "Good Cause" Committee.

- C. Disability: As defined for purposes of the Americans with Disabilities Act: (a) A physical or mental impairment that substantially limits one or more of the major life activities of an individual; (b) A record of such impairment; or (c) Being regarded as having such an impairment, as documented in meeting one of the three tests as defined in the ADA and the supporting Federal Register.

- D. Qualified Individual for Coverage Under ADA: Individual with a disability means an individual with a disability who, with or without reasonable modifications to rules, policies, or communication, or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a public entity.

7.0 Procedure:

- 01** Postpartum: Enter CO-01 in the CACTIS CA03.
- 02** Medical or Substance Abuse: Enter CO-02 in the CACTIS CA03 screen.

Note: If a participant is working with a physician regarding medical issues and begins to participate in other activities, the CO-02 shall be closed and the medical visits and treatment will be coded as CS 1.17 per P&P 02-106.

03 Mental Health Counseling: Enter CO-03 in the CACTIS CA03 screen

Note: If a participant is receiving mental health counseling and begins to participate in other activities, the CO-03 shall be closed and the mental health counseling will be coded as CS 1.17 per P&P 02-106.

04 Court Related or Child Protection: Enter CO-04 in the CACTIS CA03 screen.
Also see P&P 02-106, CS 1.9 for other possible coding options.

05 Homeless or Housing: Enter CO-05 in the CACTIS CA03 screen.
Also see P&P 02-106, CS 1.19 for other coding options.

06 Transportation: Enter CO-06 in the CACTIS CA03 screen.

07 Domestic Violence: The CACTIS CA03 screen should be coded CO-07.
Also see P&P 02-106, CS 1.9 for other coding options.

08 Vocational Rehabilitation: Enter CO-08 in the CACTIS CA03 screen.
Also see P&P 02-106, CS 1.8 for other coding options.

09 SSI: Enter CO-09 in the CACTIS CA03 screen.
Also see P&P 02-106, CS 1.9 for other coding options.

10 Child Care Unavailable for Child Under 6 Years of Age: enter CO-10 in the CACTIS CA03 screen.

11 Caring for Severely Disabled Child: Enter CO-11 on the CACTIS CA03 screen. If approved by the QAC, the employment coach shall close the CO-11 component and open a CS 14 component per P&P 02-106.

13 Appeal: Enter CO-13 in the CACTIS CA03 screen until the issue is resolved.

99 Other: Enter CO-99 in the CACTIS CA03 screen.

Note: This code may be used beyond two months without QAC approval for the period of time between a participant's Orientation/Assessment attendance and signing of an initial IRC with their employment coach, when appropriate.

7.1 Coach Approved Holds verses Quality Assurance Approved Holds

When an employment coach is working with a participant and it is determined that they meet one of the county defined reason codes, the

employment coach shall enter the corresponding hold reason code along with the CO component code in the CACTIS CA03 screen.

The coach-approved hold should not extend beyond two months per participant per program year. If the issue is expected to continue beyond two months, the employment coach shall prepare the required documentation (Work Status Report, Quality Assurance Committee Request for Temporary Hold form, and any other supporting documentation) for submission to the Quality Assurance Committee (QAC) for review as per the Works Internal Guidelines Quality Assurance Guidelines. These steps should be taken as soon as it is determined that the need for a hold will most likely extend beyond two months.

If QAC approves an extension of the CO hold, the employment coach shall close the current CO component and open an identical one using the date of QAC approval as the new component start date. This is done for tracking purposes so that we can identify the coach-approved hold versus the QAC approved hold. The coach will complete, with the participant, an Individual Responsibility Contract (IRC) that reflects the requirements of the hold, the time frame of the hold, requirements for the Monthly Contact Sheet (MCS), etc.

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