

STATE OF VERMONT
Vermont TANF State Plan Renewal

For the Period October 1, 2024, through December 31, 2027

PURPOSE

In fulfillment of the state plan requirements of Section 402 (a) of the Social Security Act, Vermont submits this state plan to renew its status as an eligible state. The plan renewal is a continuation of the state plan initially submitted September 20, 1996, and renewed on October 1, 1998; October 1, 2001; October 1, 2003; October 1, 2006; October 1, 2009; October 1, 2012; October 1, 2015; October 1, 2018 and October 1, 2021 with subsequent amendments.

This renewal is being submitted to the Secretary of the Department of Health and Human Services, through the Director of the Administration for Children and Families, in Washington, DC, in December 2024.

BACKGROUND

Vermont operates five Temporary Aid to Needy Families (TANF) funded programs: Reach Up, Reach First, Emergency Assistance, the Earned Income Tax Credit, and Child Care Transportation; as well as three Maintenance of Effort- funded (MOE) programs, Reach Up Separate State Program, Reach Ahead, and Boys and Girls Club Services, to serve the broad purposes of title IV-A of the Social Security Act. Vermont's family assistance grant is used to provide financial assistance to needy families, and to otherwise fulfill the four purposes of TANF.

ORGANIZATION OF THE PLAN

This document is structured according to the organization of the language in the Social Security Act that describes the requirements of TANF state plans. The bold headings are from section 402 of the Social Security Act (the Act).

(a)(1) OUTLINE OF THE FAMILY ASSISTANCE PROGRAM-

(A) GENERAL PROVISIONS

This plan provides an outline of how the State intends to do the following:

(i) Conduct a program, designed to serve all political subdivisions in the State (not necessarily in a uniform manner), that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program and become self-sufficient.

Outline of the Reach Up Program's General Provisions

On July 1, 2001, Vermont implemented Reach Up, its principal TANF program. The Vermont Department for Children and Families (DCF) is the single state agency that administers Reach Up. The program operates uniformly in twelve district offices throughout the state.

The Reach Up Program has two components: the financial assistance component and the services component. Adults in participating families who are receiving financial assistance must participate in the services component. Adult participants must participate in the process of planning and engaging in goal achievement. These goals may be related to family well-being, financial stability, employment, training, education, and addressing obstacles to employment. Adult participants meet services participation requirements through one or a combination of work, education, training, and other activities that address the family's goals and well-being.

Using a coaching case management model, Reach Up provides eligible families with support services and opportunities designed to address the families' goals that are related to gaining and maintaining the employment, training, and education needed for families to thrive. A "family" is defined as one or more dependent children living with one or both parents or a relative or caretaker of such children, whose income and resources are considered when determining eligibility for benefits. A "family" may consist of a pregnant individual with no other eligible children in the household either: (1) 30 days before the due date; or (2) in the case of a high-risk pregnancy, three months before the due date.

The state statute governing the Reach Up program can be in Title 33, Chapter 11 of the Vermont Statutes Annotated, located online at: <https://legislature.vermont.gov/statutes/chapter/33/011>.

The rules and procedures implementing the Reach Up program can be found in the Reach Up manual located online at: <https://dcf.vermont.gov/esd/laws-rules/current>.

Application

Financial eligibility for the program is determined by income and resource limits (see Attachment C).

Case Management and Employment Services

The Reach Up Program uses a coaching model of case management to provide services to participating families. A case manager is assigned to each participating family as soon as the family begins to receive financial assistance. Using coaching methods and the Goal, Plan, Do, Review/Revise (GPDR/R) goal achievement framework, DCF provides participating families with services, including assessment and coaching, information, referrals, and assistance in the preparation and implementation of a Family Development Plan (FDP), with the goal of helping the family reach their goals and, if applicable, find meaningful employment. DCF contracts with entities with special expertise to provide job coaching and job development services.

Assessment

Adults enrolled in Reach Up participate in an initial assessment and the Goal, Plan, Do, Review/Revise (GPDR/R) process of setting family-driven goals and following through on the tasks necessary to achieve those goals. Assessments may also include tests, other standardized evaluations, and referrals to other professionals. Using the assessment results, each adult participant sets goals that support the family's well-being.

Family Development Plans

Every participant must have an FDP. The FDP charts and documents each family's participation in the Reach Up services component. The FDP sets forth each adult participant's employment, family and individual goals, the plan and schedule of activities the participant identifies as necessary to attain the goal, and the specific FDP requirements the participant must fulfill to avoid sanctions. Development of the FDP begins when a family applies for Reach Up financial assistance.

Support Services to Participating Families

Support services are services needed by the family to overcome limitations and barriers to obtaining and maintaining unsubsidized employment and to improve the participant's prospects for job placement and retention. DCF determines the full range of support services needed by each family and includes the service plan in the FDP. Some support services are provided directly by DCF, and others are provided by community-based organizations.

DCF exercises its authority under this plan to enter into contractual agreements with community-based organizations to provide job preparation, work, and support services consistent with the goals of the program. Examples of support services include childcare, transportation, career counseling, job search assistance, vocational rehabilitation, homelessness prevention and housing assistance. Services must be identified in the FDP and determined by the commissioner to be necessary and appropriate to achieve the purposes of the Reach Up Program. Specific services provided are explained in more detail in the latter part of this section.

Special Requirements for Minor Parents and Out-of-School Youths

All minor parents must participate in their FDP activities at all times. The minor parent shall take part in case-managed support, education, and training activities. The minor parent shall attend school or an appropriate alternative education or training program. If the minor parent is not emancipated in accordance with Vermont law (12 V.S.A. §7151), the minor parent and the dependent children in the minor parent's care must reside with a parent or in an approved living arrangement.

Youths (i.e., dependent children) 16 or 17 years old who are not attending school full-time are offered the opportunity to participate in the services component.

Participant Requirements

All participating adults, unless granted a deferral of the participant requirements, shall be required to fulfill their participant requirement when they are determined eligible for financial assistance.

Participant Activities

A participating adult may meet program participation requirements through one or a combination of work, education, training, and other activities that address the family's goals and well-being as set forth in the Reach Up statute at 33 V.S.A. § 1113(c)(see Attachment D).

Deferments

Under specified circumstances, the participant requirements may be deferred. A deferment exempts a participant from the participant requirements.

Nonengagement and Good Cause

Reach Up participants must engage with all services component requirements, including the participant requirements. Nonengagement may result in sanctions. Nonengagement supported by good cause may be excused.

Sanctions for Nonengagement with Services Component Requirements

If a participating adult, including a minor parent, does not engage with services component requirements, DCF shall impose a fiscal sanction by reducing the financial assistance grant of the sanctioned adult's family. Minor parents' grants are not funded with TANF funds during periods of non-engagement with TANF requirements. Out-of-school youths who fail to comply with program requirements shall have the monetary amount designated to cover their needs removed from the family's grant.

Incentives and Disregards

DCF offers incentive payments and income disregards to encourage participants to achieve goals required by their FDPs. Income disregards are provided to families who are receiving income from employment. DCF disregards the first \$350 of earned income, and 25% of the remainder after the \$350 is deducted. DCF also offers incentive payments for participants to complete specified tasks leading to achievement of an FDP requirement, such as improvement of parenting skills and participation in secondary education.

Transportation

- Good News Garage
In a contract with this non-profit organization, DCF agrees to pay a negotiated flat fee for repairs on donated vehicles. After the vehicles are repaired, they are provided to Reach Up participants who need a vehicle to begin or maintain employment or education.

Housing

DCF contracts with organizations to provide short-term housing for homeless families with specialized housing case management services that provide intervention for families at risk of losing their home, and assistance with locating a place to live for those who have lost their home.

Child Care

The Child Development Division of DCF establishes the standards for childcare eligibility, including direct payment for transportation to and from childcare. Eligible families include families receiving financial assistance in the Reach Up Program, transitioning off the program, or at risk of becoming dependent on financial assistance. State expenditures for childcare are designated as qualified state expenditures and applied toward Vermont's maintenance-of-effort (MOE) requirements for TANF.

Temporary Absences

Vermont continues to exercise its option under section 408, paragraphs (a)(10)(A) and (B), of the Act to continue payment of TANF financial assistance benefits for a minor child absent from the home for at least 30 but not more than 180 consecutive days.

State Time Limits

While families with an adult recipient cannot receive cash assistance from federal TANF funds for longer than 60 months (unless a hardship exemption applies pursuant to 42 U.S.C. § 607(a)(7)(C)), a family in which a participating adult has received 60 or more countable, cumulative months of Reach Up financial assistance, or cash assistance funded by a TANF block grant in another state, shall be eligible for state-funded assistance under the Reach Up program if each participating adult is fully engaged with Reach Up services component requirements and is:

- actively participating in the process of planning and engaging in goal achievement related to

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- employment, training, education, and addressing obstacles pursuant to 33 V.S.A. § 1113(a); or engaged in any of the activities listed in 33 V.S.A. § 1101(2), excluding subsection (2)(L).

Months in which a participant is unable to work, caring for a child under one year of age, caring for an ill or disabled family member in the home, or domestic violence do not count toward the state time limit.

Months in which a parent is under the age of 18 or in a two-parent household with a parent under the age of 18 do not count toward the state time limit. Assistance groups with no participating adult are exempt from both state and federal time limits.

Job Retention and Enhancement Services

Reach Up participants who obtain unsubsidized employment are eligible to receive job retention and enhancement services. Participants who are no longer eligible for Reach Up financial assistance continue to be eligible for these services for up to six months after they leave the program. The services provided may include coaching and encouragement, referrals to community resources, education and training, and the range of support services provided to Reach Up participants who are meeting their work requirement through unsubsidized employment during their employment phase.

Other TANF-Funded Programs

Reach First – Vermont’s Diversion Program

Families who file a new application for assistance because they are experiencing a short-term financial crisis may be eligible to participate in Vermont’s diversion program. Reach First is a TANF-funded program that provides families with case management, financial help, and support services to address a discrete and short-term need that can be resolved within a four-month period. A cash benefit may be provided in a lump sum or in payments, based on the families’ needs. The purpose of the program is to assist the family to overcome a temporary and short-term crisis.

Financial and non-financial eligibility criteria for Reach First are the same as for Vermont’s Reach Up program, except that families’ income from child support, after disregard of the first \$100 received in a month, is counted as unearned income in determining eligibility and potential benefits.

Families who have not participated in Reach First in the past 12 months may be able to participate in the program after they have been oriented to the program participation requirements and benefits and other programs available to them. Program benefits and services are provided to Reach First families based on need. Reach First families who do not have a documented and certain plan for self-sufficiency within the four-month Reach First certification period must cooperate with assessment activities and referrals to ensure that Reach First is an appropriate program for them and that supports are in place to achieve program goals. At any point when the family is determined to be inappropriate for Reach First, the family will be advised of alternatives and assisted to transfer or participate in an alternative program.

Emergency Assistance (EA)

Vermont's TANF program authorizes emergency assistance (formerly ANFC-EA) for essential needs the family is unable to meet due to a catastrophic situation or circumstances in which the family's income and resources are exhausted.

Vermont provides families with dependent children TANF-funded EA benefits to address specific short-term (not to exceed 4 months) crisis need that the family could not have avoided and that cannot be met without DCF's intervention.

A family may qualify for EA by meeting either the non-catastrophic or the catastrophic criteria in the Emergency Assistance rules¹, or by meeting the Housing and Urban Development (HUD)/Agency of Human Services (AHS) definition of homelessness.

Non-catastrophic eligibility criteria include:

1. The applicant family includes a dependent child in the household;
2. the family has applied any available resources toward meeting the emergency need; a family with resources in excess of the emergency need is not eligible for EA; and
3. the family's income is less than the Reach Up payment standard for a family of comparable size with the same housing costs.

Catastrophic eligibility criteria include:

1. The applicant family includes a dependent child in the household;
2. The family experienced one of the following catastrophic situations: death of a spouse or child, medical emergency, natural disaster, court-ordered or constructive eviction, child welfare emergency, or domestic violence; and
3. The family has exhausted all income and resources.

Housing and Urban Development (HUD)/Agency of Human Services (AHS) definition of homelessness²:

1. Literally Homeless
2. Imminent risk of homelessness
3. Homeless under other Federal Statutes
4. Fleeing/Attempting to Flee Domestic Violence

Benefits issued under the EA program include:

- vendor payments for current utility bills, minimum heating fuel delivery, cash benefit for food and personal needs
- back rent, mortgage arrears, security deposits, and housing case management services.

Services to Alleviate Child Welfare Emergencies:

Vermont preserves its authority (Title IV-A, section 404(a)(2) of the Social Security Act) to continue providing services to alleviate child welfare emergencies using TANF funds under the former ANFC-EA plan in effect as of September 30, 1995. The child protective services previously authorized under 45 C.F.R. § 233.120 (repealed by Public Law 104-193) are defined as the investigation of reports of abuse and neglect, the assessment of family needs and strengths, and the delivery of casework and other services designed to address the risk factors that led to the abuse or neglect of the child. Services include, but are not limited to, crisis services, protective service and family support childcare, emergency shelter, foster care, and residential care for children. EA may only be authorized to those who are not eligible for payment of these services through another funding source.

Earned Income Tax Credit

The Earned Income Tax Credit (EITC) program is designed to promote work by providing needy working families with children tax credits that are refunded to the families in excess of any refunded overpayment of tax liability. The income eligibility for this state EITC is the same as for the federal EITC. The family must include a minor child to qualify for the program. This program is funded with TANF funds.

Child Care Transportation

The Child Development Division (CDD) of DCF authorizes payment for transportation to and from child care for children/families who are determined eligible through the CDD Child Care Financial Assistance Program. Eligible children include those in open cases with the Family Services Division (Protective Services); children whose families are experience short term stress (Family Support Child Care Services); and children with a Special Health need, including children with developmental delays. Payment for transportation services is limited to Protective Services, Family Support or Special Health Need childcare when the primary caretaker has no other means of transportation.

MOE-Funded Programs

Separate State Programs are programs funded with state general funds that are counted towards Vermont's MOE requirement.

The Reach Up Separate State Program Component

This program is structured to pay financial assistance with appropriated state MOE funds to families in which the parent or caretaker is engaged in unsubsidized employment for the number of hours that meets the applicable TANF participation rate requirement. The purpose of the separate state program is to preserve eligibility for TANF-funded assistance to working Reach Up families by providing them with work supports and financial assistance funded with TANF MOE. The component is operational only when there are sufficient general funds. Other than the qualifying criteria for this program, this component operates under the same rules for participation and eligibility as the standard Reach Up Program.

State-funded EA

When there are sufficient general funds, the EA benefits detailed on page 7 are funded with TANF MOE.

Reach Ahead

Reach Ahead is a separate state nutritional assistance and support services program that provides nutritional assistance and services to families who have left the Reach Up or the Postsecondary Education (PSE) financial assistance programs within the past six months.

The purpose of the Reach Ahead is to mitigate the benefits cliff, improve families' financial stability and overall well-being while transitioning off Reach Up or PSE, and reduce the need for ongoing financial assistance

Eligible families receive \$50 of nutritional assistance each month for the first 12 months and \$5 for the second 12 months of Reach Ahead participation. Families can purchase only food with Reach Ahead nutritional assistance. Eligible families also receive support services, including a 100% childcare subsidy, for the duration of time they receive nutritional assistance.

To be eligible for Reach Ahead a family must:

1. Seek enrollment in Reach Ahead within six months of leaving Reach Up or PSE;
2. include a work-eligible adult who is meeting the applicable TANF work requirement through unsubsidized employment;
3. include a minor child; and
4. meet all other Reach Up requirements such as residency, family composition and verification of income.

Boys and Girls Clubs (B&G) Services

The Boys and Girls Clubs of Vermont provide safe and healthy after-school and out-of-school activities to needy school aged children throughout Vermont. Vermont counts B&G Club expenditures to provide these services as third party MOE. For the purposes of eligibility for MOE-funded B&G services, "needy" is defined as families with a student who is eligible to receive free or reduced lunch. The B&G Club and DCF recognize it is beneficial to the residents of the State of Vermont that the DCF and the BGC join together to optimize services that will prevent out-of-wedlock pregnancies, by providing children healthy, educational opportunities in the community.

(a)(1)(A)(ii) Require a parent or caretaker receiving assistance under the program to engage in work (as defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once the parent or caretaker has received assistance under the program for 24 months (whether or not consecutive), whichever is earlier.

Vermont requires a parent or caretaker receiving assistance to engage in activities related to family well-being, financial stability, employment, training, education, and addressing obstacles to employment.

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according to the provisions of Vermont's Reach Up statute, 33 V.S.A. §§ 1112-1116, and applicable Reach Up Program rules. Parents and caretakers receiving assistance are assessed for their ability to engage in employment or other activities when they become program participants.

When a Reach Up Program participant refuses to engage in activities, as required by his or her FDP, without good cause, the participant's family grant is reduced. The first three months the grant is reduced by \$75 for each month of non-compliance. If the participant continues to refuse to engage in work for more than three months, the family's grant is reduced by \$150 per month.

All reductions in the family grant for a participant's non-engagement are per participant. If at any time there are two parents in the family who have work requirements and refuse to engage in work, the family's grant is reduced for each parent's act of non-engagement. Participants who are subject to financial sanctions must meet with their case manager at least once a month. A parent who, without good cause, does not keep an appointment with the case manager when the family grant is being reduced due to a refusal to engage in activities may result in termination of financial assistance to the family.

When a participant who has received 60 or more countable, cumulative months of Reach Up financial assistance, or cash assistance funded by a TANF block grant in another state, refuses to engage in activities without good cause, the family's financial assistance is terminated.

(a)(1)(A)(iii) Ensure that parents and caretakers receiving assistance under the program engage in work activities in accordance with section 407.

Case managers help participants define employment goals based on individualized assessments of their needs and strengths. The FDP specifies the participant's employment goal, steps and services needed to achieve the goal, and target dates for completion. The FDP also defines what support services DCF will pay for, including childcare and transportation. With the FDP in place, the case manager helps the Reach Up participant to carry out the plan and monitors his or her progress throughout the service delivery phase, modifying the plan as necessary. The State may not reduce or terminate assistance based on the refusal of an individual to engage in work activities if the individual is a single custodial parent, caring for a child under 13 years of age, and the individual proves that he or she has demonstrated an inability (as determined by the state) to obtain needed childcare for one or more of the following reasons:

- (i) Appropriate childcare within a reasonable distance from the home or work site is unavailable;
- (ii) Informal childcare by a relative or under other arrangements is unavailable or unsuitable; or
- (iii) Appropriate and affordable formal childcare arrangements are unavailable.

"Appropriate childcare" is defined as an available child care slot with a licensed or registered provider within 5 miles of the parent or caretaker's residence or normal route to a program activity or employment that corresponds to the days and hours care is needed and the age of the child needing care; or the participant or caretaker chooses an Approved Relative Child Care (ARCC) provider who is in compliance with the law over a regulated childcare provider.

"Reasonable distance" is defined as located within five miles of the parent or caretaker's residence or on

a normal route to a program activity or employment that corresponds to the days and hours care is needed.

“Unsuitability of informal childcare” is defined as childcare that the Child Development Division (CDD) classifies as Approved Relative Child Care (ARCC), and that a participant or caretaker determines to be unacceptable; and childcare that CDD classifies as either a registered family childcare home or a licensed childcare center, and that a participant or caretaker determines to be unacceptable, when such determination is confirmed by the CDD.

“Affordable childcare arrangements” is defined as childcare services by a provider that accepts the state subsidy as full payment for services or charges a co-pay above the subsidized rate that the family can pay without hardship.

Case managers evaluate whether a participant has demonstrated an inability to obtain needed childcare according to the following procedures:

1. Participant and case manager meet to discuss steps taken and if any of the above criteria exist.
2. Participant and case manager create a plan with steps to locate childcare and document on the FDP.
3. Participant and case manager reevaluate no later than two months after the plan creation.

Participation in the Reach Up Program’s services component is mandatory for all participants in the program. When Reach Up eligibility ends due to earnings from unsubsidized employment, Reach Up services to support job maintenance and enhancement may be extended for up to six months from the date of grant closure.

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

It is DCF's policy and practice that all client information be kept strictly confidential. Vermont law (33 V.S.A. § 111) prohibits the disclosure of names or information pertaining to applicants for or recipients of assistance, benefits, or social services, and further prohibits use of department records for political or commercial purposes. Department staff may disclose information about clients only for purposes directly related to the administration of DCF or under the following conditions:

- when the client specifically consents to releasing information to a third party,
- when a law enforcement officer requests the current address of a recipient who is a fugitive felon,
or
- when a report of abuse is required by law.

(a)(1)(A)(v) Establish goals and take action to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on teenage pregnancies.

By targeting the teenage population, Vermont is in the best position to reach the widest captive audience and have the greatest effect. This is particularly true with the younger teens who are more accessible as a group because they are still of school age. Focusing on teens eventually affects the greater population as the teens move toward adulthood. Reducing teen pregnancies also reduced the overall rate of out-of-wedlock pregnancies because the vast majority of these births are to single mothers.

In 2020, Vermont's teen pregnancy rate was 9.1 pregnancies per 1000. The teen birth rate in Vermont declined 57 percent between 1991 and 2011 and has continued to decline since then. Vermont has the fourth lowest teen pregnancy rate in the nation.

No single program or initiative accounts for the decreasing incidence of teen pregnancies in Vermont, however the partnership between Reach Up and the Boys and Girls Clubs is particularly important in providing a safe, healthy environment for teens. The strategy includes a combination of integrated services, education and commitments that have contributed to improved adolescent health and behavior. Some of the contributing factors employed by the State include access to appropriate health care, comprehensive health and sexuality education where students learn responsible decision-making, and improved prospects for the future. In addition, some research suggests that nearly half of adolescent girls who become pregnant have earlier been victims of sexual abuse, which is associated with later risky sexual behavior. Vermont has made remarkable progress in reducing child sexual abuse and its commitment to maintain this trend may result in further declines in teenage pregnancies.

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

In Vermont, funding for community-level rape prevention and education (RPE) work is provided to the Vermont Network Against Domestic and Sexual Violence, Umbrella, Inc. and the Sexual Assault Crisis Team. RPE programs target individuals of all genders, ages, races, sexualities, and circumstances. Most of the RPE program contractors are working in schools and communities to offer educational activities that are aimed at promoting healthy relationships and consent. Many of the local RPE program contractors work with law enforcement, community-based organizations, and educational institutions to conduct outreach and prevention education within their communities. RPE programs address the spectrum of sexual violence, including statutory rape, during their prevention education activities targeting adolescents.

Youth receive and benefit from comprehensive health education in Vermont's elementary and secondary schools. Comprehensive health education includes the study of several topics directly related to statutory rape, such as sexuality, reproduction, sexually transmitted diseases and their prevention, development of responsible personal behavior and decision making about sexual activity including abstinence, possible outcomes of premature sexual activity, contraceptives,

adolescent pregnancy, childbirth, adoption, and abortion. As an available supplement to Vermont's comprehensive health education, the Lund Family Center, a grantee of Vermont's Department for Children and Families, provides a powerful teen pregnancy prevention program designed to help teens change risky behaviors. The Lund Center's Pregnancy Prevention Panel visits schools and endeavors to educate other teenagers about the realities of pregnancy and parenting at a young age. The panel members are themselves pregnant or parenting teenagers. A staff member accompanies them to facilitate the discussion and explain the societal and economic impact of teen pregnancy. , Vermont's Department of Corrections works with sexual offenders to teach them how to accept, understand, modify and maintain permanent changes in behavior relating to illegal sexual behavior, such as statutory rape. This formal program is cognitive-behavioral and delivered primarily in group format, although extensive homework is required. DCF works to identify the correlates to the offense with each individual, to ensure that the specific nature of their offense is addressed.

(a)(1)(A)(vii) Outline how the State intends to implement policies and procedures as necessary to prevent access to assistance provided under any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance.

Participants have access to cash assistance through Electronic Benefits Transfer (EBT) cards or, for participants with a bank account, through direct deposit into their personal bank account. EBT cards are accepted at over 1,000 automated teller machines (ATM) throughout the state and at authorized Supplemental Nutrition Assistance Program (SNAP) retailers.

On November 1, 2013, Vermont adopted the following regulation restricting access to assistance through EBT transactions at prohibited locations:

A recipient of a money grant shall not knowingly use or access assistance in any electronic benefit transfer transaction in a:

- A. retail establishment which sells exclusively or primarily any alcoholic beverages defined in 7 V.S.A. § 2;*
- B. casino, gambling casino, or gaming establishment; or*
- C. retail establishment which provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.*

A recipient who uses or accesses assistance in any of the above prohibited electronic benefit transfer transactions shall reimburse the department for the amount of assistance used or accessed in the prohibited transaction.

Vermont's revised food, fuel and financial assistance application includes an acknowledgment in the "Rights and Responsibilities" section that an applicant who is found eligible for Reach Up understands that "withdrawing or spending Reach Up financial assistance is prohibited at the following locations: liquor stores, bars, casinos or other gaming facilities, and retail businesses that provide adult-oriented entertainment in which performers disrobe or perform in an unclothed state."

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In August 2015, DCF utilized new EBT software to block access to TANF assistance at ATMs in approximately 65 identified prohibited locations.

Reports of prohibited EBT transactions will be referred to the DCF, Economic Services Division (ESD) Fraud Unit for further investigation.

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

Participants have the option of having their benefits directly deposited into their personal bank accounts, or, if they do not have a bank account, benefits can be accessed through their EBT card. Information about how and where to use the card is available to participants on the DCF website. ESD posts a list of financial institutions and merchants in the state who accept the card, including those who do not apply a surcharge to the transaction. When participants receive their EBT card, they are also given a flyer which explains that they can call the toll-free number to find out where they can withdraw their cash assistance at no cost.

Section 402(a)(8) of the Social Security Act (42 U.S.C. 602(a)(8)); Consolidated Appropriations Act, 2022, section 703

Each state must certify that it has established and is enforcing standards and procedures to ensure that applicants and potential applicants for TANF are notified of assistance made available by the state to victims of sexual harassment and survivors of domestic violence, sexual assault, or stalking.

Eligibility workers and case managers are trained to refer victims and survivors of sexual harassment, domestic violence, sexual assault or stalking to the appropriate services in the community, including domestic violence agencies, victim's services, and mental health services. Eligibility workers and case managers also inform TANF applicants of the applicable waivers and deferments available to them, in addition to the financial and food assistance and other supportive services that the Economic Services Division provides.

States must ensure that case workers and other agency personnel responsible for administering the TANF program are trained in: the nature and dynamics of sexual harassment and domestic violence, sexual assault, and stalking; state standards and procedures relating to the prevention of, and assistance for, individuals who are victims of sexual harassment or survivors of domestic violence, sexual assault, or stalking; and methods of ascertaining and ensuring the confidentiality of personal information and documentation related to applicants for assistance and their children who have provided notice about their experiences of sexual harassment, domestic violence, sexual assault, or stalking.

New case managers and eligibility workers are trained in a combination of group and one-on-one sessions. These topics are included in the training content. Periodically "refresher trainings" are offered to ensure that staff feel comfortable addressing these difficult topics and offering the appropriate waivers and deferments. Procedures for both eligibility workers and case managers address the above topics as well. Sections 2201 and 2206 of Reach Up Eligibility rules address Domestic Violence:

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2201 Definition of Domestic Violence

“Domestic violence” means any of the following acts:

- i. Physical acts that resulted in, or threatened to result in, physical injury to the individual;
- ii. Sexual abuse;
- iii. Sexual activity involving an eligible child;
- iv. Being forced as the parent or caretaker of an eligible child to engage in nonconsensual sexual acts or activities;
- v. Threats of, or attempts at, physical or sexual abuse;
- vi. Mental or emotional abuse; or
- vii. Neglect or deprivation of medical care.

2206 Domestic Violence

- a. The Department recognizes that families experiencing the effects of domestic violence may face a threat to the health, safety, and well-being of one or more family members as well as an obstacle to upward economic mobility.
- b. To encourage and help such families to address the effects of domestic violence, the Department shall explain to applicants and participants that they:
 1. May ask for a deferment to Reach Up participant requirements (Reach Up Services rule 2323);
 2. May ask for a waiver of the requirement to cooperate in the pursuit of child support (rule 2232.4);
 3. Have a right to confidentiality unless the law requires a report of abuse; and
 4. May limit voluntary waivers of confidentiality based on criteria they choose, such as time periods or named collateral contacts.
- c. The Department shall provide this explanation at the time of application and eligibility review and at any time the Department receives information indicating that the applicant or participant, or a dependent child, may be or may have been a victim of domestic violence.
- d. Domestic violence is defined at rule 2201.

Section 2201C of Reach Up Eligibility Procedures addresses Domestic Violence. (See Attachment E)

Section 2323.1 of Case management rules address Domestic Violence:

2323.1 Domestic Violence Deferment

- a. The Department shall make an individualized assessment of a participant's situation and available documentation to determine whether their request for deferment because of domestic violence shall be granted.
 1. These effects may be the result of domestic violence that occurred in the past or the present.
- b. The Department shall grant a domestic violence deferment when engaging in Reach Up participant

requirements can be reasonably anticipated to result in serious physical or emotional harm to:

1. The participant, that significantly impairs their capacity to engage in Reach Up participant requirements;
 2. The participant, that significantly impairs their ability to care for a child adequately; or
 3. A child.
- c. If the Department determines that supporting documentation is necessary to determine whether the deferment shall be granted, the following items are examples of acceptable documentation:
1. Medical reports or records;
 2. Court documents;
 3. Police reports;
 4. Statements from victim advocates or staff working in a domestic violence program;
 5. School records;
 6. Reports from other FSD staff; or
 7. Statements from neighbors, employers, family, or friends.
- d. The decision to grant or deny the deferment shall be based solely on the consultation between the case manager and participant if, for any reason, the participant is unable or unwilling to provide supporting documentation that the Department had determined was necessary.
- e. The Department may grant a domestic violence deferment for a period of time as established by the case manager and participant.
- f. There is no limit to the number of times the deferment may be extended.
1. No additional verification of domestic violence is required if circumstances have not changed.

If the state has adopted the Family Violence Option (optional certification) set forth in section 402(a)(7) to establish and enforce standards and procedures regarding the screening for, and identification of, domestic violence, sexual assault, or stalking, it must provide information about the options available to current and potential beneficiaries and ensure that case workers and other agency personnel are provided with training regarding relevant state standards and procedures.

Case managers are trained to recognize the signs and effects of domestic violence, sexual assault and stalking. Case managers follow procedure P2320D – (Attachment F)

This procedure includes guidance on talking with survivors and offering options such as deferment from the work requirement, ensuring safety and confidentiality.

(a)(1)(B) SPECIAL PROVISIONS

(i) The document shall indicate whether the State intends to treat families moving into the State from another State differently than other families under the program, and if so, how the State intends to treat such families under the program.

Families moving into Vermont from other states receive the same benefits from the TANF program as current residents.

(a)(1)(B)(ii) The document shall indicate whether the State intends to provide assistance under the program to individuals who are not citizens of the United States, and if so, shall include an overview of such assistance.

Vermont provides assistance to U.S. citizens, nationals and qualified aliens pursuant to federal law. Provided they meet other Reach Up program eligibility criteria, Vermont provides TANF-funded Reach Up assistance to qualified aliens who entered the United States prior to August 22, 1996; qualified aliens who entered the United States on or after August 22, 1996 who have been in a qualified alien status for five years; and to those qualified aliens who entered the United States on or after August 22, 1996 who are exempted from the five-year bar. Those exempted from the 5-year bar include asylees; refugees (including victims of severe forms of trafficking); aliens whose deportation is being withheld, Amer-Asians, Cuban and Haitian entrants, veterans, members of the military on active duty, and their spouses and unmarried dependent children.

Provided they met the standard eligibility criteria of Reach Up, Vermont law (33 V.S.A. §1121(d)(5)) established a separate state program to provide state-funded assistance to qualified aliens who were receiving assistance before Vermont's waiver expired on July 1, 2001, and who were not eligible for TANF-funded assistance. Legal permanent residents who have worked 40 qualifying quarters of coverage are eligible for TANF-funded assistance if they meet federal criteria.

(a)(1)(B)(iii) The document shall set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how the State will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process.

Vermont will continue to operate the Reach Program based on objective criteria for determination of eligibility and delivery of benefits according to program rules and procedures in the Reach Up Manual and, for childcare assistance, according to regulatory standards established by Vermont's lead agency for administration of the Child Care and Development Block Grant, CDD. Specific changes in these rules are accomplished only after a process of administrative rule making that provides opportunity for public comment.

Vermont will continue its current fair hearing process, which provides an opportunity for a hearing before

Vermont TANF State Plan Renewal
October 1, 2024 through December 31, 2027

the Human Services Board (HSB) or by a hearing officer appointed by the board. In accordance with Vermont law (3 V.S.A. § 3091), an opportunity for a fair hearing is granted to any individual requesting a hearing because his or her claim for assistance, benefits, or services was denied, reduced or is not acted upon with reasonable promptness. An applicant for or recipient of assistance from the DCF is also entitled to a fair hearing if that individual is aggrieved by agency policy as it affects his or her situation. Vermont law assures recipients who have been adversely affected an opportunity to be heard in a state administrative appeal process.

(a)(1)(B)(iv) Not later than 1 year after the date of enactment of this Act, unless the chief executive officer of the State opts out of this provision by notifying the Secretary, a State shall, consistent with the exception provided in section 407(e)(2), require a parent or caretaker receiving assistance under the program who, after receiving such assistance for 2 months is not exempt from work requirements and is not engaged in work, as determined under section 407(c), to participate in community service employment, with minimum hours per week and tasks to be determined by the State.

Vermont will continue to operate the program under current policy and rules, as indicated in this state plan renewal.

Vermont exercises its option not to impose the work requirement specified in this provision and notified HHS of this in a letter dated December 18, 2003, from Governor James Douglas to ACF Regional Administrator Stan Gardner.

(a)(1)(B)(v) The document shall indicate whether the State intends to assist individuals to train for, seek, and maintain employment--

- (I) providing direct care in a long-term care facility (as such terms are defined under [section 1397j](#) of this title); or**
- (II) in other occupations related to elder care determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.**

Vermont does not intend to exercise the above options at this time.

(a)(2) CERTIFICATIONS

Certifications by Governor Philip Scott, Vermont's Chief Executive Officer, are provided in Attachment A.

Attachment A: Certifications

Attachment B: State Plan Funding

Attachment C: Program Income Eligibility Chart

Attachment D: Reach Up Participant

Requirements Contact Person:

Erin Oalican
Reach Up/TANF Director
Agency of Human Services/Department for Children and Families/Economic Services Division
280 State Dr, HC 1 South, H105-17
Waterbury VT 05671-1020
phone: 802-585-4621
email: erin.oalican@vermont.gov

Attachment A

STATE OF VERMONT TANF

State Plan Renewal

For the period October 1, 2021 through December 31, 2024 CERTIFICATIONS

I, Governor the of the State of Vermont, DO HEREBY CERTIFY AND ASSURE, in accordance with 42 USCA § 602(a):

1. Vermont will operate a Temporary Assistance to Needy Families (TANF) program in all political subdivisions of the State under title IV-A of the Social Security Act. The program is known as the Reach Up Program.
2. The Economic Services Division (ESD) of the Vermont Department for Children and Families (DCF) will administer and supervise the Reach Up Program. Local governments and private sector organizations:
 - a. have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and
 - b. have had at least 45 days to submit comments on the plan and design of such services.
3. The State will operate a child support enforcement program in accordance with the State Plan approved under title **IV-D**.
4. The State will operate a foster care and adoption assistance program in accordance with title IV-E and will take all necessary actions to ensure that children receiving assistance are eligible for medical assistance.
5. The State will provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a Tribal Family Assistance plan approved under 42 USCA § 612, with equitable access to assistance under the Reach Up Program attributable to funds provided by the federal government.
6. The State has established and is enforcing standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage.
7. The State will make available to the public a summary of the State Plan.
8. Vermont exercises the family violence option under 42 USCA § 602(a)(7)(A).
Accordingly, DCF has adopted policy and rules, provided staff training, and implemented

procedures for its Reach Up Program that are designed to help families address the effects of domestic violence and move toward self-sufficiency through work.

9. The State will establish and enforce standards and procedures to ensure that applicants and potential applicants for assistance under the state program funded under this part are notified of assistance made available by the state to victims of sexual harassment and survivors of domestic violence, sexual assault, or stalking. The state will ensure that case workers and other agency personnel responsible for administering the state program funded under this part are trained in the nature and dynamics of sexual harassment and domestic violence, sexual assault, and stalking; state standards and procedures relating to the prevention of, and assistance for, individuals who are victims of sexual harassment or survivors of domestic violence, sexual assault, or stalking; and methods of ascertaining and ensuring the confidentiality of personal information and documentation related to applicants for assistance and their children who have provided notice about their experiences of sexual harassment, domestic violence, sexual assault, or stalking. The State will ensure that, if the state has elected to establish and enforce standards and procedures regarding the screening for, and identification of, domestic violence, sexual assault, or stalking pursuant to the Family Violence Option (found at section 402(a)(7) of the Social Security Act): the TANF program provides information about the options available to current and potential beneficiaries; and case workers and other agency personnel responsible for administering the TANF program are provided with training regarding state standards and procedures related to the Family Violence Option.

Deputy Secretary, Agency of Human Service

Date

Attachment B

STATE OF VERMONT TANF State Plan

Renewal

For the period October 1, 2021 through December 31, 2024

1. Payments to the Agency administering the payments for the TANF program will be made to DCF for Children and Families, 280 State Drive, Waterbury, VT 05671-1201.

2. Payments for the TANF Program will be made in quarterly installments, for each fiscal year during the period of renewal by percentage, as follows:

<i>1st</i> Quarter	<i>2nd</i> Quarter	<i>3rd</i> Quarter	<i>4th</i> Quarter
25%	25%	25%	25%

Attachment C

Program Eligibility Criteria

PROGRAM	INCOME LEVELS	RESOURCE LIMITS																
Reach Up Program (including Reach Up Separate State Component)	<p>Countable income below payment standards calculated by (1) adding countable housing expenses up to the maximum allowance for the county of residence to the basic needs allowance for the family size, (2) multiplying the sum by the ratable reduction percentage (49.6%), and (3) rounding the result down.</p> <p>Housing maximum allowance \$400 outside Chittenden County \$450 inside Chittenden County</p> <p>Basic Needs Allowance by Household Size</p> <table border="1" data-bbox="423 892 1102 1050"> <tr> <td>1</td> <td>\$644</td> <td>5</td> <td>\$1733</td> </tr> <tr> <td>2</td> <td>\$942</td> <td>6</td> <td>\$1907</td> </tr> <tr> <td>3</td> <td>\$1236</td> <td>7</td> <td>\$2203</td> </tr> <tr> <td>4</td> <td>\$1478</td> <td>8</td> <td>\$2458</td> </tr> </table> <p>\$236 Each additional person</p>	1	\$644	5	\$1733	2	\$942	6	\$1907	3	\$1236	7	\$2203	4	\$1478	8	\$2458	Countable resources shall not exceed \$9,000.
1	\$644	5	\$1733															
2	\$942	6	\$1907															
3	\$1236	7	\$2203															
4	\$1478	8	\$2458															
Emergency Assistance	Countable income below Reach Up payment levels above. ¹	Shall have no resources available to meet the emergency need.																
Reach Ahead	Must have met the Reach Up Eligibility criteria above within 6 months prior to Reach Ahead application and must be meeting applicable federal work activity through employment. ²	Not applicable.																
Boys and Girls Club Services	Families with a student who is eligible to receive free or reduced lunch.	Not applicable.																
Child Care	Same as eligibility for Reach Up or Reach Ahead Program (see above).	Same as Reach Up or Reach Ahead Program (see above).																
Reach First	Same as eligibility for Reach Up Program (see above).	Same as Reach Up Program (see above).																
Earned Income Tax Credit	Parents of minor children who are financially eligible for the	Not applicable																

¹ Under the temporary waiver of the EA catastrophic eligibility criteria (see <https://dcf.vermont.gov/sites/dcf/files/CVD19/ESD/Emergency-Housing-Rules-09.03.21.pdf>), countable household income must be under 185% FPL. This waiver is due to expire 6/30/2022.

² Pursuant to 2023 Acts and Resolves No. 78, Sec. E 323.7, from July 1, 2023 to June 30, 2025, families that met the Reach Up criteria within the past 12 months may be eligible for Reach Ahead.

	federal earned income tax credit.	
Child Care Transportation	Children who are eligible for the Child Care Financial Assistance Program	Not applicable

Attachment D

The following descriptions of Reach Up participant activities are from 33 V.S.A. § 1113(c).

(c) A participating adult may meet program participation requirements, including the following activities, through one or a combination of work, education, training, and other activities that address the family's goals and well-being:

- (1) employment, either full-time or part-time;
- (2) activities that develop and enhance the skills employers need their employees to have in the workplace, including:
 - (A) career-specific training programs;
 - (B) English language learning;
 - (C) literacy and math skill courses; or
 - (D) credential programs;
- (3) entrepreneurship and business development;
- (4) job search and career exploration, including:
 - (A) engaging in work experience; or
 - (B) participating in job shadow opportunities;
- (5) education, including obtaining:
 - (A) a high school diploma;
 - (B) technical training and vocation education; or
 - (C) career-specific education;
- (6) building foundations for employment, including:
 - (A) housing search efforts;
 - (B) arranging transportation; or
 - (C) arranging child care;
- (7) activities aimed at improving family and financial well-being, including:
 - (A) financial capability classes and coaching;
 - (B) mental health treatment;
 - (C) treatment for substance use disorder;
 - (D) working with children's health and school professionals;
 - (E) applying for Supplemental Security Income; or
 - (F) working with the Division of Family Services; or
- (8) any other activity designated by the Commissioner in accordance with criteria established in rule pursuant to 3 V.S.A. chapter 25.

Unsubsidized Employment

Unsubsidized employment is a core activity. Unsubsidized employment means full-or part-time employment in the public or private sector that is not subsidized by TANF or any other public program.

Self-employment is a type of unsubsidized employment. Self-employment is working for oneself in a job that results in net income to the participant, after business expenses, of no less than the sum of Vermont's minimum wage multiplied by the number of hours the participant claims as working in self-employment.

A participant may count hours engaged in self-employment when the participant is meeting the full work requirement with hours in self-employment or in self-employment combined with hours in other countable work activities.

Participants may count toward their work requirement hours engaged in self-employment when:

- The hours the participant claims as engaged in self-employment are either verifiable as specified in Vermont's federally approved work verification plan or net the participant the Vermont minimum wage after business costs calculated consistent with Reach Up financial eligibility rules

Subsidized Private Employment

Subsidized private employment is a core activity. Subsidized private employment is a job in the private sector that pays wages that are subsidized with Reach Up or other public funds or for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a participant. Subsidized employment includes supported employment for individuals who have disabilities when it is supported with TANF or public funds.

Subsidized Public Employment

Subsidized public employment is a core activity. Subsidized public employment is the same as subsidized private employment in all respects except that the job is in a public sector employment setting.

On-the-Job Training

On-the-job training is a core activity. On-the-job training means training in the public or private sector that is given to a paid employee while he or she is engaged in productive work and that provides knowledge and skills essential to the full and adequate performance of the job.

Attachment E

P-2201C Domestic Violence Procedure

The Department is committed to helping Reach Up families experiencing the effects of domestic violence to address those effects and begin to overcome economic barriers to independence. The following information and script are designed to help workers when interacting with potential victims of domestic violence.

Guidelines for Interacting with Victims of Domestic Violence

Most victims of domestic violence find it very difficult to talk about it.

For some victims, it is not safe to talk about domestic violence unless the discussion is very private.

These are guidelines to follow whenever talking about domestic violence with anyone who might have experienced it.

DON'T —

- Don't ask them how they can put up with it, don't ask why they don't just leave, and don't imply that they have brought the abuse on themselves or their family in any way.
- Don't press them to talk about domestic violence more than they are willing to, even if you are sure they have been abused.
- Don't pressure them to take steps that may lead to more violence. For example, don't pressure them to talk to a domestic violence program specialist, file a police report, or petition for a restraining order.
- Don't question their judgment or their value as a parent or blame them for the domestic violence.
- Don't slip a referral card or other information about domestic violence into their bag or tell them to take the handout Domestic Violence – You Don't Have to Face It Alone (form [ESD201DV](#)) with them. If their abuser sees that they have information about abuse, it might trigger more violence.
- Don't send them mail or leave messages for them that relate to domestic violence.
- Don't try to talk to their abuser about domestic violence.

DO —

- Do allow them to ask questions without assuming they are a victim.
- Do treat them with respect; allow them to maintain their dignity and be mindful of your words.
- Do make information available about services that may help them deal with domestic violence.
- Do take steps to protect their privacy and safety by offering to meet in a private office and keeping the information confidential.

REMEMBER—

- Their abuser may become more violent when they try to improve their situation by going to work or training. The abuser may make it difficult for them to work or attend training.
- For a variety of legitimate reasons, they may not know that they are a victim.
- Even if they are not experiencing domestic violence now, they may still be experiencing the effects of it. Children who have only witnessed domestic violence, for example, may have trouble learning or relating to other people.

Domestic Violence Script

Each household must be informed of the right to request a child support waiver (Reach Up rule 2235.2) and work requirements deferment (Reach Up Services rule 2360). Offer the parent the [ESD201DV](#) and follow the script below. Please note that, for simplicity's sake, the directions in the script refer only to parents, however, the script will be followed for all Reach Up applicants and participants, whether they are parents or other caretakers.

1. The department recognizes that domestic violence occurs at all income levels, including in families receiving benefits from us. We want the families we serve to know that we're aware they may be affected by domestic violence and are here to listen to them. We understand that some people don't know what domestic violence is and may not realize that what is happening in their life is considered to be domestic violence. So, we have prepared this brief information sheet for everyone to read.

[Hand the 201 DV to the parent (or other caretaker). If both parents are present give a copy to each of them. If anyone, including a child, accompanies the parent, continue to 2, which does not encourage discussion. If the parent is alone, skip to 3.]

2. I'll give you a few minutes to read it. *[Pause while the parent reads]*

[If the parent does not express a clear desire to discuss the notice or domestic violence, stop the discussion and continue with other interview topics unrelated to domestic violence.

If the parent does express a clear desire to discuss domestic violence, skip to 4.]

3. I'll give you a few minutes to read it here. Then, if you have any questions, we can talk about them. *[Pause while the parent reads it.]*

4. I can answer questions you have about the information you've just read or give you more information about the local domestic violence program and the services it offers to families affected by domestic violence. If you want to talk about your situation, everything you say will be kept strictly confidential unless it involves child abuse. I am required by law to report child abuse.

[If you are not in a private office, say the following.] If you'd be more comfortable talking about this in a more private space, tell me, and I'll arrange for us to move to one. [If the parent wants to talk in a private space, stop the discussion immediately and follow your district office's procedures to move the interview to a private space before going on with the discussion.]

Would you like to ask any questions or talk about this some more so that I can recommend some other agencies for your needs?

[If the parent indicates no, continue to 5. If the parent indicates yes, skip to 6.]

5. All right, that's fine. I would like you to know that we do have information about domestic violence programs here. You can request a waiver of the requirement to pursue child support. You may also talk to your case manager about a deferment from the work requirements because of domestic violence.

[Then stop the discussion and continue with other interview topics unrelated to domestic violence, unless the parent, upon hearing about the child support waiver and work requirements deferment, has questions about either of them.]

6. If you are requesting or thinking about requesting a child support waiver, it would be beneficial for me to learn more about your situation. What would you like to talk about?

[Allow the parent to lead the discussion, following the guidelines in this section for interacting with people who may have experienced the effects of domestic violence. If, at any point, the parent indicates a desire to stop the discussion or appears uncomfortable with the subject, stop the discussion and continue with topics unrelated to domestic violence.]

Provide the parent with information about the domestic violence programs, the child support waiver and Reach Up. Advise the parent that they may further discuss the work requirement deferment with their case manager. Talk about the child support waiver if it applies to the parent's situation, regardless of whether the parent asks about it. If, at any point in the discussion, the parent indicates that any member of his or her family may have experienced the effects of domestic violence, continue to 7 immediately.]

7. Are you safe now?

[If they are not safe, follow your district procedures for handling unsafe domestic violence situations. If you don't know what they are, ask your supervisor.]

Attachment F

P-2320D Reach Up Services Domestic Violence Procedures (24-06)

The Department is committed to helping families experiencing the effects of domestic violence to address those effects and begin to overcome economic barriers to independence.

Guidelines for interacting with victims of domestic violence

Many people who have experienced domestic violence find it very difficult to talk about it.

For some, it is not safe to talk about domestic violence unless the discussion is very private.

These are guidelines to follow whenever talking about domestic violence with anyone who might have experienced it.

DO —

- Allow them to ask questions without making assumptions about their experience with domestic violence.
- Make information available about services that may help them deal with domestic violence.
- Take steps to protect their privacy and safety by offering to meet in a private office and keeping the information confidential.
- Ask them if this is an appropriate time to speak if you are not meeting with them in person. Typical cues that may be easier to identify when meeting in person may be harder to identify when meeting over the phone or virtually.

The following are things to avoid —

- Don't ask them how they can put up with it, don't ask why they don't just leave, and don't imply that they have brought the abuse on themselves or their family in any way.
- Don't press them to talk about domestic violence more than they are willing to, even if you are sure they have been abused.
- Don't pressure them to take steps that may lead to more violence. For example, don't pressure them to talk to a domestic violence program specialist, file a police report, or petition for a restraining order.
- Don't question their judgment or their value as a participant,
- Don't slip a referral card or other information about domestic violence into their bag or tell them to take the handout Domestic Violence – You Don't

Have to Face It Alone ([201DV](#)) with them. If their abuser sees that they have information about abuse, it might trigger more violence.

- Don't send them mail or leave messages for them that relate to domestic violence.
- Don't try to talk to their abuser about domestic violence.

REMEMBER—

- Their abuser may become more violent when they try to improve their situation by going to work or training. The abuser may make it difficult for them to work or attend training.
- For a variety of legitimate reasons, they may not know that they are experiencing domestic violence.
- Even if they are not experiencing domestic violence now, they may still be experiencing the effects of it. Children who have witnessed domestic violence, for example, may have trouble learning or relating to other people.

Confidentiality

If the participant is accompanied by friends, relatives or companions, do not initiate or persist in discussion about domestic violence unless the participant clearly begins and continues the discussion, since the companion may be the abuser or may report back to the abuser.

Inform the participant that any discussion of domestic violence may take place in a private space in the district office where the conversation cannot be overheard. If the participant wishes to continue in a private space, stop the discussion immediately and follow the district office procedures to move the interview to a private space.

Request to stop the clock on Reach Up time limits because of the effects of domestic violence

Participants who feel they cannot take part in activities to support improving finances because of the effects of domestic violence may request to have the clock stopped from Reach Up time limits.

DV related forms and documentation

Give the participant the form Request for a Deferment from Work Requirements Because of the Effects of Domestic Violence ([310WA](#)) to complete. Ask the participant if they need help completing the form. If so, help the participant complete the form, but make sure the request is in the participant's own words.

Tell the participant that if they want the statement to include information that is already in other documentation, such as a police report, they may attach that

documentation and refer to it instead of rewriting the same information in the statement. Help the participant provide any necessary documentation. Use the ESD Authorization to Release Information ([201WC](#)) for the participant's permission to obtain the documentation.

Child Support Waiver

If a participant has a current approved child support waiver from the requirement to cooperate in the pursuit of child support, ask the participant if they would like to attach the information provided for the waiver to the [301WA](#), in place of, or in addition to, the 301WA itself. The point is to not make the participant provide duplicate information if they have already provided it to the department for other reasons.

Not all situations that require a child support waiver will also require the clock to be stopped on Reach Up time limits.

If the participant has a pending child support waiver, help the participant provide any necessary documentation. Use the [201WC](#) for the participating's permission to waive confidentiality so you can obtain the documentation.

If the participant does not currently have a child support waiver, ask them if they would like to pursue it and fill out the Waiver of Cooperation for Child Support form ([137W](#)). Refer to the [Child Support Waiver procedure 2215B](#). Check OnBase to see if the Child Support Authorization form ([137](#)) they handed in with their application has the waiver box checked. If the waiver box was not checked, add a sticky note to the original 137 in OnBase indicating that the participant has now requested a waiver. Email the District Management Team letting them know the status of the paperwork and asking that the code on the ABSP panel be updated.

All child support waiver related paperwork is kept in a separate classification file in the district office. If the request for a child support waiver has been approved, review the information provided and make a note in case notes. Do not make a copy of the paperwork for the case management file. If the waiver is denied, continue to determine whether it is appropriate to stop the clock on Reach Up time limits.

Participant goals when clock is stopped from Reach Up time limits

Use the goal achievement process to see what the participant would like to focus on. Create a plan with the participant to achieve their goals. Place the participant in the corresponding code in ACCESS while the request is being reviewed.

- Code 54 - Unable to work due to domestic violence (will not count towards the participant's time limit)

Preparing the participant for the decision

Tell the participant the decision on the request for a stop the clock on Reach Up time limits as soon as possible but that it can take up to two weeks from the time the [310WA](#) is completed.

Discuss with the participant whether it would be safe to mail the Notice of Decision Deferment or Modification of Work Requirement (DV) ([620DV](#)) to them if it is approved. Make a note in the file if the decision can be mailed or not.

Tell the participant that if the request is denied, an appointment will be scheduled for them to come in to discuss it and to see if there might be other ways to address their current situation or revise the request so it would be approved.

Submitting request for clock to be stopped on Reach Up time limits

Complete the Domestic Violence Exemption Supplement ([310DV](#)).

Fill out the top of the [620DV](#).

As soon as possible, but within two days, give the entire package to the Reach Up Supervisor. The package must include:

- the [310WA](#)
- any additional documentation or a reference to any documentation available in the district's classified file
- the [310DV](#)
- the [620DV](#) with the top portion completed

Reach Up Supervisor determines need to stop the clock on Reach Up time limits

Review the [310WA](#), the case manager's comments on the [310DV](#), and any additional documentation provided. Approve or deny the request on the [310DV](#) and return it and the [620DV](#) to the case manager.

The clock can be stopped for up to six months, and then can be extended for six-month periods.

Informing the participant of decision

When a decision is made to stop the clock on Reach Up time limits, either mail the participant the [620DV](#), if the participant had agreed to that earlier, or contact the participant and schedule an appointment to come in, if the participant did not want you to mail the 620DV.

Do not mail the 620DV to the participant unless they gave you specific instructions to do so.

At the appointment, give the participant the 620DV and discuss the decision. If the request was denied, explore possible revisions of the request or alternative ways of addressing the situation and explain the participant's appeal rights.

Reach Up file

Place original documents ([310WA](#), [310DV](#), and [620DV](#)) and all supporting documentation in the participant's case file in the 4th brad. Copies of the child support waiver paperwork and related documentation do not need to be added to the file. Instead just refer to them in case notes.

Voluntary participation for participants experiencing effects of Domestic Violence

If a participant informs you they are experiencing the effects of domestic violence and have an immediate safety concern in relation to this, the participant can elect for voluntary participation in the Reach Up Program. Discuss with the participant the benefits and supports of working with a Reach Up Case Manager. If the participant is interested in participating in case management services, then schedule a meeting a minimum of monthly by participant preference (phone, virtual, in person, home visit). Work with the participant around identifying a goal using Goal Plan Do Review Revise (GPDR/R) and create a Family Development Plan. All Reach Up Case Management services and supports should be offered, however the participant is not subject to a conciliation or sanction for non-engagement during this time frame. If the participant is not interested in case management services then continue to check in a minimum of monthly to ensure the participant is aware of services and supports in the event they would like to begin engaging in goal setting. Follow the stop the clock procedure as noted above to collect needed in the home documentation Place the participant in a code 54 and set a review date of three months. If after three months the participant is requesting more time consult with a Reach Up Supervisor to determine next steps and what level of supports are needed.

Attachment G

CRITERIA FOR DEFINING HOMELESSNESS	Category 1	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> (i) Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; (ii) Is living in supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); <u>OR</u> (iii) Is exiting an institution where (s)he resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
	Category 2	Imminent Risk of Homelessness	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; <u>AND</u> (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.
	Category 3	Homeless under other Federal statutes	<p>(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> (i) Are defined as homeless under the Runaway and Homeless Youth Act (42 U.S.C. 5732a, section 387), the Head Start Act (42 U.S.C. 9832, section 637), the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2, section 41403), the Public Health Service Act (42 U.S.C. 254b(h), section 330(h)), the Food and Nutrition Act of 2008 (7 U.S.C. 2012, section 3), the Child Nutrition Act of 1966 (42 U.S.C. 1786(b), section 17(b)) or McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a, section 725); (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; (iii) Have experienced persistent instability as measured by two moves or more during the preceding 60-days; <u>AND</u> (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.
	Category 4	Fleeing/ Attempting to Flee Domestic Violence	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; (ii) Has no other residence; <u>AND</u> (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.