



*Conejos County*  
*Department of Human*  
*Services*  
**POLICY**

<b>POLICY TITLE</b> County Approved Settings	<b>REFERENCE</b> C.R.S. 26-2-706.6; 26-2-709 9 CCR 205-6
<b>POLICY NO.</b> 001 – CWP	<b>EFFECTIVE DATE</b> March 01, 2022
<b>DIVISION DIRECTOR APPROVAL</b> <i>Nicholas Barela</i>	<b>BOARD OF COUNTY COMMISSIONERS ADOPTION DATE</b> <i>Aug 16<sup>22</sup></i>

**BACKGROUND & PURPOSE**

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

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

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

**DEFINITIONS**

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

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

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

**Colorado Works** - The TANF program in Colorado.

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

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

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

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

## POLICY

### Population

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

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

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

### Evaluation Process

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

1. The Colorado Works eligibility worker will notify **Child Welfare Supervisor** of the need for evaluation of a county approved setting.
  - a. The eligibility worker will provide the name, address and contact information for the minor parent.
  2. **Child Welfare Supervisor** will:
    - a. Contact the minor parent to discuss their living situation.
    - b. **Conduct a home visit, if the contact with the minor parent alone is not deemed sufficient to determine whether the situation is appropriate.**
  - i. For a setting to be determined appropriate in **Conejos County**, the minor parent's living arrangements must consist of a dwelling that is designed for human habitation that is free from anything that may endanger the health or welfare of the minor child(ren).
  - c. Provide appropriate resources and referrals to the minor parent as identified in the Referrals section.
  - d. Notify the eligibility worker if the setting is determined appropriate (a.k.a. approved) or data-enter the information into CBMS directly.
  - e. If the setting is not yet approved, **Colorado Works Case Manager** will work with the client to establish an appropriate setting, and communicate progress with the Program Eligibility Supervisor and the **Child Welfare Supervisor**.

### Unapproved Settings

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

1. Together with the minor parent, discuss options of places to live which would be safe and supportive for the minor and their child(ren) such as living with a parent, legal guardian or other appropriate adult relative.
2. If living with a parent, guardian or adult relative is not a safe or supportive option, Conejos County will discuss with the minor parent whether there are any other trusted adults who might provide a safe and supportive environment to live.
3. If no informal living arrangements with a safe and trusted adult are suitable, Conejos County will provide, or assist the client in locating, a second chance home (adult-supervised, supportive group homes or apartment clusters for teen mothers and their children who cannot live at home because of abuse, neglect or other extenuating circumstances), maternity home (a form of supportive housing provided to pregnant women), or other appropriate adult-supervised supportive living arrangement, taking into consideration the needs and concerns of the individual.
4. Conejos County may approve Colorado Works for a maximum of sixty days while the designated county department / individual is actively working with the minor parent to relocate to an appropriate living situation.
5. If the change in living arrangement significantly alters the client's circumstances, updates may be required to the Colorado Works case, or the minor parent may choose to withdraw their request for Colorado Works.

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

#### Referrals

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

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

Signed by:

*Matthew Jarvis*

CHAIR, CONEJOS COUNTY BOARD OF COUNTY COMMISSIONERS

*8/18/22*

DATE

*Conejos County*  
*Department of Human Services*  
**POLICY**



<b>POLICY TITLE</b> Disaster Assistance	<b>REFERENCE</b> C.R.S. 26-2-137; 26-2-703; 26-2-706.6 9 CCR 2503-6
<b>POLICY NO.</b> 002 – CWP	<b>EFFECTIVE DATE</b> March 1, 2022
<b>DIVISION DIRECTOR APPROVAL</b>  <i>Nicholas Barela</i>	<b>BOARD OF COUNTY COMMISSIONERS ADOPTION DATE</b>  <i>Aug 16<sup>22</sup></i>

**BACKGROUND & PURPOSE**

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

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

**DEFINITIONS**

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

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

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

**Colorado Works** - The TANF program in Colorado.

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

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

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

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

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

## **POLICY**

### Activation of the Policy

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

### Process

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

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

### Eligibility

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

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

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

### Payment

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

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

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

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

Allowable Use of Funds

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

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

Deactivation of the Policy

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

Signed by:

*Mitchell Jarvis*

CHAIR, CONEJOS COUNTY BOARD OF COUNTY COMMISSIONERS

*8/18/22*

DATE

*Conejos County*  
 Department of Human Services  
**POLICY**



<b>POLICY TITLE</b> Diversion	<b>REFERENCE</b> C.R.S. 26-2-706.6 9 CCR 2503-6
<b>POLICY NO.</b> 003- CWP	<b>EFFECTIVE DATE</b> March 1, 2022
<b>DIVISION DIRECTOR APPROVAL</b>  <i>Nicholas Barcela</i>	<b>BOARD OF COUNTY COMMISSIONERS ADOPTION DATE</b>  <i>Aug 16<sup>22</sup></i>

**BACKGROUND & PURPOSE**

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

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

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

**DEFINITIONS**

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

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

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

**Colorado Works** - The TANF program in Colorado.

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

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

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

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

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

## POLICY

In **Conejos County**, diversions are made when:

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

**Conejos County** provides cash diversion payments not to exceed **\$2,500 total** per assistance unit to eligible and suitable clients based upon an established need, in conjunction with the determination that the need is not expected to be ongoing.

### Eligibility

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

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

### Assessment, Need and Suitability

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

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

The following criteria must be established:

- The client does not need long-term cash assistance.
- The client demonstrates a specific short-term need. (The estimated cost of the need may be established without external verification by accepting a client declaration determined to be reasonable according to the Prudent Person Principle.)
- The client must have a plan to be able to support themselves ongoing if the one-time crisis situation can be resolved.
- Clients must not have received greater than three diversions lifetime or cumulative diversions in excess of \$5,000

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



### Period of Ineligibility

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

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

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

All Diversion payments will serve upto a POI of six (6) months.

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

### Payment

Diversion payments will be made through CBMS. A diversion payment may not exceed \$2,500 per assistance unit. The actual payment amount of each diversion will be based on the client's estimated need. A diversion payment will not be issued in an amount that is less than the client would receive in BCA during the time period of the POI.

The County Director or designee has the discretion to override the amount of a diversion if a hardship exists.

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

### Allowable Use of Funds

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

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

In addition to these needs, Conejos County will not provide diversion payments to cover any court-mandated penalties or fees.

### Terms

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

- The reason why ongoing cash assistance is not a need.
- The client understands and agrees to the POI.
- The client will attend a brief budgetary course provided by the Department.

- The possible impacts on other assistance, including the loss of categorical eligibility for SNAP, transition to low income childcare through the Colorado Child Care Assistance Program, and any other programs the client may benefit from through other agencies.  
The discussion shall be documented through comments in the statewide automated system within five business days of the date of the diversion discussion.

Signed by:

  
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CHAIR, CONEJOS COUNTY BOARD OF COUNTY COMMISSIONERS

  
\_\_\_\_\_

DATE

Conejos County  
Department of Human Services  
**POLICY**



<b>POLICY TITLE</b> Domestic Violence	<b>REFERENCE</b> C.R.S. 26-2-716 9 CCR 2503-6
<b>POLICY NO.</b> 004 – CWP	<b>EFFECTIVE DATE</b> March 01, 2022
<b>DIVISION DIRECTOR APPROVAL</b>  <i>Nicholas Barala</i>	<b>BOARD OF COUNTY COMMISSIONERS ADOPTION DATE</b>  <i>Aug 16<sup>22</sup></i>

**BACKGROUND & PURPOSE**

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

**DEFINITIONS**

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

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

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

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

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

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

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

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

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

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

## **POLICY**

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

### Screening and Assessment

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

might be performed non-verbally (using a screening document or form), or the conversation might be deferred to another time. If the screening for DV must be deferred, the county will identify that child support good cause is pending in the statewide automated system to ensure that referrals to child support are not made before the client has been screened. DV screenings or discussions will not be initiated, verbally or nonverbally, in the presence of another adult without the CW client's approval.

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

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

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

#### Waiver

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

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

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

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

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

#### Referrals

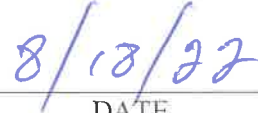
Conejos County provides referrals to appropriate DV advocacy, counseling, and support services, to include the Conejos Shelter, the Conejos County Public Health agency, law enforcement, and legal aid. Brochures and other informational handouts regarding domestic and family violence issues are distributed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

Training

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

Signed by:





CHAIR, CONEJOS COUNTY BOARD OF COUNTY COMMISSIONERS

DATE

Conejos County  
Department of Human Services  
**POLICY**



<b>POLICY TITLE</b> Hardship Extensions	<b>REFERENCE</b> C.R.S. 26-2-716(5) 9 CCR 2503-6
<b>POLICY NO.</b> 005 – CWP	<b>EFFECTIVE DATE</b> March 01, 2022
<b>PROGRAM MANAGER APPROVAL</b>  <i>Nicholas Barola</i>	<b>DIVISION DIRECTOR APPROVAL</b>  <i>Aug 16<sup>22</sup></i>

**BACKGROUND & PURPOSE**

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

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

**DEFINITIONS**

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

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

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

**Colorado Works** - The TANF program in Colorado.

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

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

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

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

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

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

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

## **POLICY**

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

### Eligibility

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

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



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

*Process*

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

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

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

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

*County Utilization of Hardship Extensions*

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

Signed by:



CHAIR, CONEJOS COUNTY BOARD OF COUNTY COMMISSIONERS



DATE

*Conejos County*  
 Department of Human Services  
**POLICY**



<b>POLICY TITLE</b> Other Assistance and Supportive Payments	<b>REFERENCE</b> C.R.S. 26-2-706.6; 26-2-709 9 CCR 2503-6
<b>POLICY NO.</b> 006- CWP	<b>EFFECTIVE DATE</b> March 01, 2022
<b>DIVISION DIRECTOR APPROVAL</b> <i>Nicholas Barela</i>	<b>BOARD OF COUNTY COMMISSIONERS ADOPTION DATE</b> <i>Aug 16<sup>22</sup></i>

**BACKGROUND & PURPOSE**

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

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

**DEFINITIONS**

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

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

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

**Colorado Works** - The TANF program in Colorado.

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

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

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

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

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

## **POLICY**

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

### Eligibility

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

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

### Assessed Needs

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

Assessed needs may include:

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

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

### Supportive Payments

**Conejos County** may address assessed needs by issuing supportive payments through the statewide automated system (the Colorado Benefits Management System (CBMS)) to the client's Electronic Benefit Transfer account or as a CBMS direct vendor payment, or through other supports offered by community providers. **Conejos County's other** assistance or supportive payments may not exceed **\$1,000** in a single payment transaction and **\$1,000** per year and no more than **\$5,000** lifetime. **Child-only households will be eligible for \$7,500 lifetime assistance.** Other assistance payments or supportive payments funded through other programs/resources (monetary or not) do not count towards a client's lifetime supportive payment limit. The County Director has the discretion to override the amount of other assistance or supportive payments issued to a CW client or family.

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

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

#### Unallowable Supportive Payments

The below assessed needs are not eligible for supportive payments:

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

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

#### Referrals

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

Referrals include but are not limited to:

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

#### Employment Incentives

Conejos County will also issue incentives with supportive payment funding, per the below guidelines and limits:

Contingent upon available funding, Conejos County will offer the following incentives for various family milestones, educational milestones, finding and maintaining employment, cooperating with case management and any outside agencies when referrals for services are made on the clients behalf, and other job readiness activities as listed below:

Family/Educational Milestones:

Adults

1. Enroll, attend, and maintain passing grades in a University, Trade School, and Community College. The Department will verify attendance over 85% and grades every semester. (\$100.00)

2. Enroll and attend a higher learning program such as GED, English as a Second Language (The Department will verify attendance every semester ( \$50.00)

#### Children

3. Completion of school and earning a High School diploma, GED, certificate and/or degree (\$50)
4. For each child in the home; maintain satisfactory grades and perfect attendance. (\$25)

#### Seeking, finding and maintaining employment:

1. Participating in a job interview, on the job training, participating in the STEP program as referred (\$25)
2. Register with workforce center (\$10)
3. Gain fulltime/part time employment (\$25)
4. Maintaining employment for at least 30 days (\$50)
5. Participating in community service, unpaid internships and externships
6. Participating in community referrals made by the county worker such as Working Together, DVR, Workforce Center, Tu Casa, Job Fairs, Job readiness tranings, etc. (\$25)

#### Cooperation with workforce development:

1. Attending follow up appointments with case manager (\$10)
2. Turning in requested documentation timely including but not limited to monthly work activity tracking sheets and verificataion of school informaiton, etc. (\$10)

#### Participating in job readiness activities including but not limited to:

1. Attending substance abuse treatment (\$25)
2. Mental health treatment (\$25)
3. Domestic violence (\$25)

#### Non-Custodial Parent Supportive Payments

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

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

Signed by:

  
\_\_\_\_\_  
CHAIR, **CONEJOS COUNTY** BOARD OF COUNTY COMMISSIONERS

  
\_\_\_\_\_  
DATE

*Conejos County*  
*Department of Human Services*  
**POLICY**



<b>POLICY TITLE</b> Workforce Requirements & Employment Outcomes	<b>REFERENCE</b> C.R.S. 26-2-703(21); 26-2-711(1)(b) and (5)(a)(b); 26-2-714(5.5) 9 CCR 2503-6
<b>POLICY NO.</b> 007 – CWP	<b>EFFECTIVE DATE</b> March 1, 2022
<b>DIVISION DIRECTOR APPROVAL</b> <i>Nicholas Barcela</i>	<b>BOARD OF COUNTY COMMISSIONERS ADOPTION DATE</b> <i>Aug 16<sup>22</sup></i>

**BACKGROUND & PURPOSE**

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

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

**DEFINITIONS**

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

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

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

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

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

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

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

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

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

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

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

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

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

## **POLICY**

### **Initial Workforce Development**

#### *Work Eligible Clients*

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

#### *Demonstrable Evidence*

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

#### *Workforce Development Screening*

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

#### *Workforce Development Assessment*

Conejos County uses the State prescribed WD assessment with all work-eligible clients. The assessment must be completed at a client's first WD appointment and at least once every six months or more frequently based off client need.

The WD assessment must be completed prior to and shall be utilized to inform the development of a client's IP.

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

Client's may share circumstances that impact their employability during the WD assessment, including:

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

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

#### Condition Agreement

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

#### Initial Individualized Plan

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

#### Ongoing Workforce Development Case Management

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



### Ongoing Workforce Development Assessment

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

### Individualized Plan Modification

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

### Work Activities

#### Engaged in Work Activities

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

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

#### Allowable Work Activities

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

Allowable work activities include:

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

Conejos County WD clients are considered to be engaged in WD program requirements if they are participating in any work activity listed above, a barrier activity, or any other work activity in the Work Verification Plan. Client's will report their engagement (number of hours) in a work activity in the month by the end of the following month (with the exception

of work activities that allow projecting hours). Conejos County workers will reference the Work Verification Plan to allow as much flexibility as possible for the client's engagement reporting method.

- Allowable ways to report engagement include:
  - Client declaration that is made in writing, such as an email communication, or made verbally with supporting documentation entered into the state's automated system or the client's case file.
    - Examples of client declaration include, but are not limited to: a client declaring how much time is spent on a job application for their job search, a client submitting a timesheet declaring homework hours for an educational activity, or a client providing the number of hours spent in workplace soft skills training at a work experience site. If the number of hours declared by the client falls outside of generally recognized practices, additional substantiation of hours may be warranted.
  - Pay stubs, timesheets, tracking sheets, or employer-issued documentation.
  - School-issued documentation including progress reports, report cards, and attendance records.
  - Interfaced electronic data from a credible source such as the National Directory of New Hires (NDNH).
  - Colorado's Department of Labor & Employment Job Bank, also known as Connecting Colorado.
  - Collateral contact. For the purposes of substantiating hours, a collateral contact could include worksite supervisors, employers, human resource departments, school officials, or other individuals with firsthand observation or experience with the information that is being verified.
  - Projecting participation hours for up to six months at a time (for paid work activities).
  - If no other means to substantiate hours exists, PPP, which is the Conejos County workers' reasonable judgment of actual hours, can be documented.

The Conejos County worker will record a client's program engagement, through the number of hours a client has spent in an activity, in the statewide benefits management system within five business days of the client reporting, or a Conejos County worker determining engagement in an activity.

#### Fair Labor Standards Act

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

#### Good Cause and Re-engagement

##### Good Cause

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

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

1. Breakdown in child care arrangements
2. Lack of available and appropriate child care
3. Remotely located without transportation
4. Breakdown in transportation arrangements with no feasible alternative
5. School obligations that frequently necessitate a parent's or caretaker's attendance
6. Loss of housing or a housing crisis that might result in homelessness or eviction
7. Medical emergencies, including mental health, substance abuse, or crisis, involving anyone in the household
8. Physical or mental disability or illness of the client or an individual in the client's care
9. Legal proceedings for the client or other immediate family members

10. Employment issues when layoffs occur, wages are below applicable federal and state minimum wage standards, working conditions present a risk to health or safety, or workers' compensation protection does not exist
11. Client's incarceration
12. Jury duty
13. Death of an immediate family member or authorized representative
14. Other situations as determined by the county, to include:
  - a.

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

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

### Re-engagement

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

- Missing a scheduled meeting
- Not participating with the IP

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

Conejos County workers will make every effort to re-engage clients immediately over the phone or through a virtual platform. Re-engaging clients using these methods does not require a new or updated IP and serves as the re-engagement appointment if the client provides a written or verbal waiver that written notice of the scheduled appointment (described below) is not necessary.

### Scheduling the re-engagement appointment

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

The written notice shall include:

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

If the client reports good cause, or the Conejos County worker determines good cause at any time during the re-engagement schedule process, even after the 11 day calendar period the client has to report good cause, the re-engagement process ends. The Conejos County worker will enter a case comment including the date and type of contact made to determine good cause into the statewide automated system within five business days of determining good cause.

#### Attending the Re-engagement Appointment

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

#### Missing the Re-engagement Appointment

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

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

#### Exceptional Dis-engagement

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

### Sanctions

#### Effect of a sanction on the grant payment

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

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

- **First, Second, and Third level sanctions:** The reduction for the first, second, and third instance of sanction shall be 25% of the client's assistance unit's grant payment. The sanction shall be in effect for one month for each level of sanction. A first, second, or third instance of sanction shall progress to the next level of sanction if the client does not re-engage in the WD program (defined in the re-engagement section of this policy) by the end of the month that the sanction is being served.

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

#### Serving a sanction

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

#### Sanctioning more than one client in an assistance unit

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

#### Re-engagement following a sanction

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

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

#### Appeal of a Sanction

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

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

#### Sanctions from other counties and states

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

#### Workforce Development Outcomes

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

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

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

- Attainment of a credential or certificate

- Job wage
- Job O\*Nct Code
- Job title
- Employer name

Signed by:

*Michelle Jarwa*

*8/18/22*

CHAIR, CONEJOS COUNTY BOARD OF COUNTY COMMISSIONERS

DATE