



# STATE OF IOWA

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## MEMO

**TO:** Tony Dietsch, Lori Adams, Marilyn Rowe, Paula Freeman, Jane Schockemoehl, Jack Mustapha, Iowa Workforce Development  
Wayne Johnson and John Wiedemeier, Bureau of Refugee Services  
Bill Brand, Janet Gartin, Lorie McCormick, Tim Fitzpatrick, Department of Human Rights  
DHS Service Area Managers and Income Maintenance Supervisors

**FROM:** Ann Wiebers, Administrator, Division of Financial, Health and Work Supports

**SUBJECT:** **PROMISE JOBS MEMO #161– Hours of Participation for Two-Parent Cases, Suspension of Self-Directed Job Search, New Procedures for Reporting Hours of Participation for Postsecondary Training, and Reminders on Existing Post-Secondary Training and Employment Policies**

**DATE:** October 6, 2006

This PROMISE JOBS memo implements revised policies and procedures:

- To suspend use of the Self-Directed Job Search component until further notice, and
- For the entry of hours of participation in post-secondary training.

The memo provides reminders on the existing policies for:

- Post-secondary training, and
- Full-time employment.

The revised policies become effective immediately with the issuance of this memo. Use the instructions in this memo in lieu of any contrary instructions in the PROMISE JOBS Provider Manual. The PROMISE JOBS Provider Manual will be updated as soon as possible.

### **Background on TANF Reauthorization:**

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 created the Temporary Assistance for Needy Families (TANF) program. Under this legislation:

- Adults are limited to 60-months of TANF assistance in a lifetime.
- Adults receiving assistance are expected to engage in work activities and develop the capability to support themselves before the 60-month limit runs out.
- States must meet work participation rates in order to maintain TANF funds.
- Acceptable work activities were broadly defined, giving states flexibility in the types of activities and services to provide clients.

The federal Deficit Reduction Act (DRA) of 2005 reauthorized the TANF program. The legislation directed the Administration for Children and Families (ACF), Health and Human Services (HHS) to further define acceptable work activities. Also under the new law, states must establish work activity verification procedures. ACF/HHS issued interim final regulations on

June 28, 2006, requiring states to comply with the newly defined work activities by October 1, 2006. The new regulations decrease state flexibility in the types of activities and services that count towards participation rates, define how states must count participation in the work activities, and increase the requirements for verifying participation in the work activities.

For the most part, Iowa's existing work activities and methods for counting and verifying participation in these activities are within the interim regulations. However, the TANF regulations specifically disallow participation in training leading to a baccalaureate degree as countable toward the federal participate rate. Iowa must change the way participation in training leading to a baccalaureate degree is reported to comply with the interim regulations. Additionally, the interim regulations require that job search activities be supervised on an ongoing basis, no less frequently than daily. Under Iowa's Self-Directed Job Search component, participants provide no documentation of their job search activities to PROMISE JOBS, which allows for no supervision. Therefore, Iowa must suspend use of the Self-Directed Job Search component until administrative rules are changed to eliminate or change the component.

### **Hours of Participation for Two-Parent Cases:**

Informational Only! Effective October 1, 2006, all PROMISE JOBS child care will be funded with state-only dollars. This means that parents in two-parent cases must be participating in countable work activities at least 35 hours per week to meet federal work participation rates.

Federal regulations require that the parents in two-parent cases must be participating in countable work activities at least 55 hours per week if the family receives federally funded child care. Due to the funding change, the 55-hour requirement will not apply to two-parent families in Iowa.

### **Revised Policy - Suspension of Self-Directed Job Search Component:**

Effective immediately, use of the Self-Directed Job Search component is suspended as an FIA activity as the component does not meet the verification requirements of the federally defined work activity of "job search and job readiness assistance".

### **For Ongoing Cases with Self-Directed Job Search as Current Activity:**

Under current policy, Self-Directed Job Search is limited to four weeks, or a calendar month, and is only appropriate for FIP participants who can reasonably be expected to locate employment within this time frame, and who do not need the support of child care or transportation assistance.

Allow FIP participants who are in Self-Directed Job Search as the current FIA activity to continue as long as:

- You have received and approved the participant's written job search plan, and
- The "targeted end date" is **on or before October 31, 2006.**

If Self-Directed Job Search is the current activity, and the "targeted end date" is **on or before October 31, 2006**, and the participant has not provided a written job search plan, or is otherwise

not complying with the FIA, begin or continue to attempt to resolve the participation issue by sending a written reminder, and following other procedures per the PJPM, pages 243 through 262. If the person does not resume participation by renegotiating the FIA, make entry to start a Limited Benefit Plan (LBP).

If Self-Directed Job Search is the current FIA activity, and the “targeted end date” is **November 1, 2006, or later**, send a *Notice of Appointment or Participation*, form 470-0813, scheduling the person to discuss renegotiation of the FIA. Send the *Notice of Appointment or Participation* as soon as possible but no later than November 1, 2006.

At the FIA renegotiation appointment, explain that the Self-Directed Job Search component is no longer available as an FIA option. Assist the person with selecting other FIA activities and renegotiate the FIA. If the person does not appear for the appointment, attempt to resolve the participation issue by sending a written reminder and following other procedures as per the PJPM, pages 243 through 262. If the person does not resume participation by renegotiating the FIA, make entry to start a Limited Benefit Plan (LBP).

IWD will provide a list of persons currently coded as participating in Self-Directed Job Search (with component code 2A) and place the list in your network IWD library. Use this list to determine if there are persons on your caseload currently coded as participating in Self-Directed Job Search and if you need to take one of the above actions.

#### **Developing New FIAs and Renegotiating Existing FIAs:**

Upon receipt of this memo, **do not** include Self-Directed Job Search as a current or future FIA activity. Use Individual Job Search or the group job search that is included in the Job Club component instead when job search is appropriate.

#### **For Existing FIAs With Self-Directed Job Search as a Future Activity:**

It is not systematically possible to identify existing FIAs within your caseload with Self-Directed Job Search as a future FIA activity. As you are managing your cases, review the existing FIA to determine if the FIA includes Self-Directed Job Search as a future activity. If you identify an FIA with Self-Directed Job Search as a future activity, tickle the case to alert you at least one month prior to the “targeted start date” of the Self-Directed Job Search component to schedule the person to renegotiate the FIA.

At the FIA renegotiation appointment, explain that Self-Directed Job Search component is not currently available as an FIA option. Assist the person with selecting other FIA activities and renegotiate the FIA. If the person does not appear for the appointment, attempt to resolve the participation issue by sending a written reminder and following other procedures as per the PJPM, pages 243 through 262. If the person does not resume participation by renegotiating the FIA, make entry to start a Limited Benefit Plan (LBP).

### **New Procedures for Reporting Hours of Participation in Postsecondary Education:**

The TANF regulations specifically disallow participation in training leading to a baccalaureate degree as countable toward the federal participate rate:

- Persons in training leading to a baccalaureate degree must be coded with component code PE.
- Persons in training that is not leading to a baccalaureate degree and is not short-term training must be coded with component code PV.

Use the following new procedures when processing September time and attendance to allow Iowa to accurately exclude persons participating in training leading to a baccalaureate degree when reporting countable hours of participation for federal reporting purposes.

For participants currently active under component code PE who are **not** enrolled in a training program leading to a baccalaureate degree and not in short-term training:

- Enter actual hours of participation for September.
- Make “Q” screen entries to close the PE component. Use code “5” (improper placement) as the reason for component termination.
- Make “O” screen entries to open a new component record under component PV.

For participants currently active under component code PV and who are currently enrolled in a training program leading to a baccalaureate degree:

- Enter actual hours of participation for September.
- Make “Q” screen entries to close the PV component. Use code “5” (improper placement) as the reason for component termination.
- Make “O” screen entries to open a new component record under component PE.

Continue to follow existing procedures for reporting hours of participation in short-term training (VE and VV).

IWD will provide a list of persons currently coded as participating in postsecondary education in component codes PE and PV and place the list in your network IWD library. Use this list to determine if there are persons on your caseload currently coded with component codes PE or PV and if you need to take one of the above actions.

### **Policy Reminder! Current Policy on Post-Secondary Education**

Other than the new procedures for entering hours of participation for post-secondary training that is not short-term training, **Iowa has made no further changes to rules, policies, or procedures** for post-secondary training. For participants who desire training, demonstrate the capability, and when the training is otherwise approvable under current rules and policy, PROMISE JOBS needs to continue to:

- Allow postsecondary training as an FIA activity, including new enrollments in training leading to a baccalaureate degree, **and**

- Provide assistance with child care and transportation expenses for up to 24 months, when needed, for participation in all vocational educational activities.

By **October 1, 2007**, DHS plans to pursue rule changes to **disallow** post-secondary education **leading to a baccalaureate degree** as approvable training under the PROMISE JOBS program. Until DHS issues written notification that policy has changed, PROMISE JOBS needs to **continue** to allow new enrollments in post-secondary education leading to a baccalaureate degree when other approvable training requirements are met.

Participants currently enrolled in such a training plan and those who enroll prior to further written notification from DHS will be allowed to continue as long as the participant is making satisfactory progress towards completion of the training plan. Once revised policies are in effect, participants desiring to enroll in post-secondary education leading to a baccalaureate degree will need to participate in other work and training activities to meet the requirements of the PROMISE JOBS program.

PROMISE JOBS, IM and FaDSS staff will be notified in writing if PROMISE JOBS is directed to change policies and procedures regarding postsecondary education.

**Policy Reminder! Current Policy Regarding Hours of Employment:**

Consider persons who are working full-time (30 hrs or more per week or 129 hrs per month) to be meeting the obligations of the FIA by continuing in the employment if FIP eligibility continues and the FIA ending date has not been reached. Consider persons who are working less than full-time to be meeting the obligations of the FIA so long as that employment is part of the FIA. As FIAs with part-time employment as the only FIA activity reach their FIA ending date and FIA renegotiation is appropriate, renegotiate the FIA to include the part-time employment in combination with participation in other PROMISE JOBS activities when participant circumstances allow.

Remember it is acceptable for a participant to leave part-time employment to move into another step of the FIA.

To maximize countable hours of participation in employment under current policy:

- Enter projected hours of employment for working FIP applicants at the time the FIA is written. Project by using actual verified hours worked in the last 30 days or use anticipated future hours if a change is indicated through verification from the employer.

If FIP is approved, Iowa can opt to report the hours of employment that occurred in the months prior to the FIP approval month while the application was pending.

- Enter projected hours of employment for working FIP persons, even if FIP cancels. Project by using actual verified hours worked in the last 30 days or use anticipated future hours if a change is indicated through verification from the employer.

Your entry of hours of employment allows Iowa to report the hours for federal work participation rate credit.

Please make this information available to PROMISE JOBS staff in each Service Delivery Region as quickly as possible. If you have questions, please contact DeAnn Barnhill by e-mail at [dbarnhi@dhs.state.ia.us](mailto:dbarnhi@dhs.state.ia.us) or by calling 281-6082 or Shari Seivert at [sseiver@dhs.state.ia.us](mailto:sseiver@dhs.state.ia.us) or by calling (515) 281-0703.