

PROMISE JOBS

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Overview

The Iowa Department of Health and Human Services (HHS) administers an employment and training program known as “PROMISE JOBS.” The PROMISE JOBS program assists Family Investment Program (FIP) recipients in achieving economic self-sufficiency by increasing the availability of employment and training opportunities.

Only people applying for or receiving FIP are eligible for PROMISE JOBS assistance. The following definitions apply to the PROMISE JOBS program.

Definitions

“Applicant” means a child for whom FIP assistance is being requested, any parent living in the home with the child, and any nonparental relative who is requesting assistance for the child.

“FaDSS” means the HHS Family Development and Self-Sufficiency program which provides family development services to families at risk of instability or long-term FIP dependency. FaDSS prioritizes PROMISE JOBS participants who require concentrated services to overcome severe or multiple barriers in order to become self-sufficient.

“Family investment agreement” or “FIA” is an individualized agreement between the FIP applicant or recipient and PROMISE JOBS that outlines the family's needs, the actions the family will take, the services to be provided by PROMISE JOBS, and the time frames to be met by the family so they can become economically self-supporting.

“FIA-responsible person” means any member of the FIP family who is required to sign an FIA, participate in FIA activities, and is not exempt from participation in the PROMISE JOBS program.

“FIP” means the HHS Family Investment Program which provides cash assistance to needy families with children.

“Limited benefit plan” or “LBP” means a period of time that an FIA-responsible person or their family is ineligible for FIP or eligible for reduced assistance due to an FIA-responsible person's failure to meet FIA requirements.

“Participant” for purposes of the PROMISE JOBS program means a person who has signed an FIA and is receiving FIP, an FIA-responsible parent living in the home of a child receiving FIP, or a person reconsidering a subsequent limited benefit plan.

“PROMISE JOBS program” means the HHS Promoting Independence and Self-Sufficiency through Employment, Job Opportunities, and Basic Skills program.

All FIP applicants must meet with a PROMISE JOBS case manager to develop and sign an FIA as a condition of FIP eligibility, unless exempt. FIP recipients initially determined to be exempt from FIA requirements and who lose exempt status must sign an FIA to continue receiving FIP.

Continued FIP eligibility is contingent upon the family following the steps in their FIA and failure to comply may result in a loss or reduction of FIP for the family.

Though the program goal for all participants is to be involved in PROMISE JOBS activities on a full-time basis, defined as an average of 30 hours per week, PROMISE JOBS case managers must balance this goal with the needs and skills of each individual family. Participants are expected to participate to the highest level possible given their individual situation.

PROMISE JOBS FIA services and activities include:

- Orientation
- Assessment
- Job Search/Job Readiness Activities:
 - Job readiness skills training
 - Individual and structured job search
 - Mental health, substance abuse and other rehabilitative treatments.
- Work Activities:
 - Monitored employment, including full or part-time, subsidized and self-employment
 - On-the-Job Training
 - Work Experience Placement
 - Unpaid Community Service
- Education and Training, including:
 - High school completion
 - High School equivalency
 - Adult basic education
 - English as a second language
 - Postsecondary training
- Family Violence Option
- Family Development and Self-Sufficiency (FaDSS) services and other family development services
- Parenting skills training
- Referral for Family Planning Counseling

HHS Income Maintenance (IM) workers determine the PROMISE JOBS referral status (FIA-responsible or exempt) of FIP applicants and recipients. IM workers refer FIA-responsible applicants and FIP recipients who lost their exempt status to PROMISE JOBS through entry into the HHS eligibility system.

The following sections give information about the administration of the PROMISE JOBS program:

- [Legal Basis](#)
- [Agencies Responsible for Provision of Services](#)
- [Availability of PROMISE JOBS Services](#)
- [Limit on PROMISE JOBS Assistance](#)
- [Determining the 60-Month Limit](#)
- [Reporting Child Abuse](#)
- [Confidentiality](#)

Legal Basis

The legal basis for the PROMISE JOBS program is found in:

- Title IV-A of the Social Security Act.
- Iowa Code Chapter 239B.
- 441 Iowa Administrative Code, Chapters 41, 47 and 93.

Iowa's FIP and PROMISE JOBS programs implement and are funded by the federal Temporary Assistance for Needy Families (TANF) program. TANF is:

- Initially authorized under Title I of the Personal Responsibility and Work Opportunities Reconciliation Act of 1996 (PRWORA),
- Reauthorized on February 8, 2006, through the Deficit Reduction Act of 2005, Public Law 109-171.

Agencies Responsible for Provision of PROMISE JOBS Services

Legal reference: 441 IAC 93.2(239B)

Iowa Workforce Development (IWD), through a contract with HHS, provides PROMISE JOBS services statewide.

Iowa Department of Health and Human Services (HHS), administers the PROMISE JOBS and Family Development and Self-Sufficiency (FaDSS) program. FaDSS is available statewide by public and private agencies under contract with HHS and is considered a supportive service to the PROMISE JOBS program.

Availability of PROMISE JOBS Services

Legal reference: 441 IAC 93.2(1)

The PROMISE JOBS program is available statewide, subject to sufficient funding.

HHS reserves the authority to prioritize the availability of services to FIP applicants and participants due to state and federal budgetary limitations, federal mandatory work requirements, requirements for minimum participation rates, and other TANF requirements imposed on the PROMISE JOBS program.

This includes the authority to:

- Determine agency and geographical breakdowns for service;
- Designate specific groups of applicants or participations for priority services; and
- Designate specific PROMISE JOBS components or supportive payment levels for a waiting list.

HHS will notify PROMISE JOBS and FaDSS staff if an administrative need develops that requires services to be prioritized or limited.

Limit On PROMISE JOBS Assistance

Legal reference: 441 IAC 41.30(239B) and 93.11(1)"b"

Federal law imposes a 60-month lifetime limit on the amount of time that families with adults can receive TANF-funded assistance. This limit applies to FIP since it is TANF-funded. PROMISE JOBS services are also subject to a family's 60-month FIP limit. See [Hardship Exemption](#) for FIP/PROMISE JOBS eligibility beyond 60 months.

Determining the 60-Month FIP Limit

Legal reference: 441 IAC 41.30(1) and (2)

HHS IM staff determine when a family has reached the 60-month limit.

The entire family is ineligible when the person who has received assistance for 60 months is:

- The adult parent of the child on FIP, or
- The stepparent who is in the home with the parent and child, on the grant.
- The minor parent of the child on FIP when the minor parent is payee.

In a nonparental case, only the needy specified relative becomes ineligible at the end of the 60-month period. Assistance for the children may continue.

Procedure: See [4-C, Limit on FIP Assistance](#) for more information on how HHS determines the 60-month limit.

The 60-month limit applies only to FIP assistance. Families whose 60-month FIP period ends may still get other types of assistance, such as Medicaid, SNAP, or Child Care Assistance.

HHS tracks the 60-month limit via the FIP Eligibility Tracking System (FET), which obtains the information from entries made on the HHS eligibility system and from the Issuance Verification (ISSV) system. FET tracks months of assistance for each adult whose assistance must be counted.

PROMISE JOBS staff have access to FET through the HHS WISE system.

FET reflects the 60-month count for each adult whose assistance must be counted toward the limit regardless of current FIP status or case number in which the FIP was received.

Routinely access FET to determine the 60-month FIP count for applicants and participants. For example, access FET:

- When receiving a referral and writing the initial FIA.
- When renegotiating and amending FIA's.
- When conducting the six-month FIA progress review.
- At any other time when determining the family's 60-month FIP status is pertinent.

At a minimum, discuss the 60-month limit during orientation while writing or renegotiating the FIA and during family contacts when appropriate. Stress to participants the importance of planning early how to become self-supporting by the end of the 60-month FIP period. Let them know that PROMISE JOBS staff can help them prepare for that time.

When a member of a family reaches the 60-month limit, the IM worker will send a timely *Notice of Decision* to cancel FIP at the end of the family's 60-month period. IM will proceed to cancel FIP even if the family has filed form 470-3826, *Request for FIP Beyond 60 Months*. The 60-month cancellation notice informs the family that:

- It will get another notice about the status of its hardship exemption request, and
- Cancellation of FIP assistance also cancels PROMISE JOBS services.

If timely notice cannot be met, FIP will be canceled effective the second month following the end of the 60-month period. FIP and PROMISE JOBS assistance issued for the first month is subject to recoupment unless the family requests and is determined eligible for a hardship exemption that includes the first month.

The IM worker is responsible for establishing the FIP overpayment. PROMISE JOBS is responsible for establishing the PROMISE JOBS overpayment.

If PROMISE JOBS learns that a FIP applicant or participant has received assistance in another state, the District of Columbia, or a United States territory, contact the IM worker or team, not the other state.

The IM worker will contact that state or territory to verify whether the assistance received was TANF assistance that counts toward the federal 60-month limit, as some forms of cash assistance are not countable toward the federal 60-month limit.

The IM worker will record each countable month in the FET “FIP Individual History” screen. When IM records out-of-state months in FET, FET considers them, in addition to any Iowa months received, in determining the number of months the person has used and has remaining. FET reports reflect that combined total.

The IM worker will notify PROMISE JOBS when out-of-state months are added for a participant who has already been referred to PROMISE JOBS, as it may be necessary to modify the family’s FIA to fit the shortened remainder of their 60-month period.

If the addition of countable out-of-state months causes a participant to exceed the 60-month limit, the IM worker will cancel the case with timely notice and notify PROMISE JOBS. See [Hardship Overpayments](#) for information on recouping assistance issued beyond the 60-month limit.

Reporting Child Abuse

Legal reference: 441 IAC 175.23(2)

PROMISE JOBS staff who, in the course of employment, believes a child has been abused must make an oral report of the abuse allegations to HHS within 24 hours of suspecting the abuse.

PROMISE JOBS staff are not required to make a written report, although they may do so if they wish. PROMISE JOBS staff should call the HHS Abuse Hotline at 1-800-362-2178 and make their report to the child protective assessment intake worker.

After filing a report, PROMISE JOBS staff are not entitled to written notification that the assessment has been completed or to a copy of information placed on the Registry.

Confidentiality

Legal reference: Iowa Code Section 217.30; 441 IAC 9.7(17A, 22, 228); 441 IAC 9.10(7); 93.2(2)c

Policy: All agencies involved in the provision of PROMISE JOBS services shall safeguard participant information in conformance with Iowa Code Section 217.30.

PROMISE JOBS agencies, for the purposes of this section, refers to HHS (income maintenance and FaDSS) and IWD (PROMISE JOBS). Because of the contracts and agreements with these agencies, staff that work with PROMISE JOBS participants within these agencies and within their subcontractors or grantees are subject to the same laws, and rules with regard to confidentiality. It is expected that each agency has and enforces comparable policies and procedures for safeguarding confidentiality.

Sharing within a PROMISE JOBS Agency:

Participant or applicant information shall not be disclosed to or used by any person within a PROMISE JOBS agency except for purposes of administration of the PROMISE JOBS program.

Sharing between PROMISE JOBS Agencies:

Information about a PROMISE JOBS participant or applicant can be confidently shared between the PROMISE JOBS agencies. All information shared between agencies shall be used only for purposes of administration of programs, services, or assistance.

Sharing between PROMISE JOBS and other IWD staff:

PROMISE JOBS staff may share information with other IWD staff and IWD subcontractors without a release signed by the participant as long as the information is being shared to carry out the duties of the PROMISE JOBS program.

Obtain a release signed by the participant, prior to releasing information to IWD and its subcontractors, if the information being shared is not needed to carry out the duties of the PROMISE JOBS program.

Sharing with agencies outside of PROMISE JOBS:

PROMISE JOBS applicant or participant data may not be shared outside of the PROMISE JOBS agencies without signed authorization given by the applicant or participant for release of the information to a specified agency or person.

PROMISE JOBS applicant or participant protected health information (PHI) may **never** be shared outside of the PROMISE JOBS agencies without signed authorization given by the participant for release of that **specific** information to a specified agency or person.

PHI is any identifiable health information specific to:

- Mental health
- Disability information
- Alcohol or drug abuse
- HIV/AIDS

- Supplemental Security Income (SSI)
- Social Security Disability Insurance (SSDI)
- Medicaid or hawk-I status

“Release of information” means one of the following:

- Granting access to or allowing the copying of a record.
- Providing information either in writing or orally.
- Acknowledging information to be true or false.

See [1-C](#) for an overview of confidentiality policies for all HHS programs. Each PROMISE JOBS worker shall receive training on confidentiality policies.

Procedure: On a practical level, these confidentiality measures mean that information can be shared within a PROMISE JOBS agency and between PROMISE JOBS agencies on a need-to-know basis. A worker can share information about a participant to the extent that the other worker needs to know this information in order to provide services to the PROMISE JOBS participant. It is the responsibility of each agency to determine what information is needed in order to provide services.

Ask an applicant or participant to sign form 470-0429, *Consent to Obtain and Release Information* before sharing information with a state agency or entity who is not a PROMISE JOBS agency, an IWD employee, or IWD subcontractor, providing employment or training services to the applicant or participant. This applies even when the agency or entity is providing a service needed for successful participation in PROMISE JOBS and when sharing is solely for the purpose of making a referral to the other agency. When there is a need to share confidential non-health-related information outside of PROMISE JOBS agencies, the *Consent to Obtain and Release Information* must specify the confidential non-health-related information to be released.

When there is a need to share PHI, use the *Authorization to Obtain or Release Health Care Information*, form 470-3951 and specify the confidential PHI to be released.

See [Release with Participant’s Authorization](#) for more information.

Comments:

You would like to refer Ms. A to FaDSS and call the FaDSS worker to discuss the situation.	Release not needed. FaDSS is a PROMISE JOBS agency.
You would like to refer Mr. B to Vocational Rehabilitation Services, a division within IWD, and call the VR worker, who is either an IWD employee or IWD subcontractor, to discuss the situation.	Signed release is not needed. Information is being shared within a PROMISE JOBS agency for the purpose of administration of the PROMISE JOBS program.
Mr. B was just approved for Section 8 and is looking for a new unit. You would like to speak with the Section 8 worker to understand the program and timelines to help Mr. B look for housing.	Signed release is needed.
Mr. C is co-enrolled with WIOA and is attending school. You would like to share his grades and his class schedule with the worker from the WIOA program who is either an IWD employee or an IWD subcontractor.	Signed release not needed. Information is being shared within a PROMISE JOBS agency for the purpose of administration of the PROMISE JOBS program.

The following sections address procedures for:

- [Release of information for administrative purposes](#)
- [Release of information with the participant's authorization](#)
- [Releasing information over the telephone](#)

Release for Administrative Purposes

Policy: IWD (PROMISE JOBS, other IWD staff, or IWD subcontractor staff), HHS staff, and FaDSS grantees can share participant information in response to requests for information on shared applicants or participants needed in order to provide necessary services or administrative purposes without requiring a signed release from the participant. Examples of necessary services or administrative purposes include but are not limited to FIP eligibility, Quality Control (QC) review, Department of Inspections, Appeals, and Licensing (DIAL), PROMISE JOBS services, Child Care Assistance (CCA), and FaDSS services.

PROMISE JOBS may also release participant case file information, without requiring a signed release from the participant, to federal or state officials who are responsible for determining whether HHS or IWD is operating the PROMISE JOBS program lawfully.

Procedure: Upon request, release applicant or participant case file information for necessary services or administrative purposes, which include but are not limited to FIP eligibility, QC review, DIAL, PROMISE JOBS services, CCA, FaDSS services, and federal or state officials who are responsible for determining whether HHS or IWD is operating the PROMISE JOBS program lawfully.

If you receive an apparent inappropriate request for information from a PROMISE JOBS partner agency, resolve the concern by contacting your supervisor or IWD QA staff.

Release with Participant's Authorization

Legal reference: 441 IAC 9.7(17, 22, 228)

Policy: To the extent permitted by any applicable provision of law, a person who is the subject of a confidential record may have a portion of that record concerning the subject disclosed to a third party.

“Authorization to release information” means a written statement, signed and dated by the person empowered to authorize release of confidential information. The statement shall specify:

- To whom information is to be released,
- What information is to be released,
- The period of time for which the authorization to release information is to be effective.

Procedure: You can release confidential non-health-related information and PHI **only** when the participant, or the person responsible for the participant authorizes you to release that information.

To meet these requirements for non-health-related information, complete form 470-0429, *Consent to Obtain and Release Information*, and have it signed by the participant before sharing any information, whether in writing or verbally.

Complete all information on form 470-0429 and give any verbal explanation necessary to the participant's understanding of it before the participant signs the form. Never ask the participant to sign a blank form. (See the [PROMISE JOBS Provider Manual Appendix](#).) **Do not** use 470-0429 for health-related information.

To meet these requirements for health-related information, complete form 470-3951, *Authorization to Obtain or Release Health Care Information*, and have it signed by the participant before sharing any information, whether verbally or in writing.

All dates used on the release forms must be specific. (This means month/day/year.) The beginning date is the date the participant signs the authorization. You must also give a specific end date.

However, if the participant's training completion date is extended for any reason, the participant must sign a new timely release covering the additional time.

Releasing Information Over the Telephone

Legal reference: 441 IAC 9.7(17A, 22, 228)

Procedure: Providing information over the telephone removes obstacles to speedy and efficient communication with the participant, Social Security offices, other staff, etc. However, you must take extreme caution before disclosing information over the phone. Do not disclose or discuss confidential information or PHI unless the person requesting the information is authorized to receive it under other provisions in chapter [1-C](#).

Do not disclose any information, even the fact that a person is a participant, unless you are certain you are speaking to an authorized person, even if the caller claims to have information that would be beneficial to the participant. To ascertain that the person calling is, in fact, an authorized person before providing the requested information you can use methods such as the following:

- Use positive voice recognition.
- Have a record of the telephone number of the authorized person already on file or verify it by another source, and call back to that number before disclosing the information.

If it is impossible to be certain that the caller is an authorized person, suggest other methods of getting the information, such as coming to the office with the participant or submitting a written request. Document occasions of releasing information by a note in the case record, stating the name of the caller and the circumstances.

Referring Persons to PROMISE JOBS

Legal reference: 441 IAC 41.24(239B), and 93.3 (239B)

Policy: All FIP applicants and participants must sign a Family Investment Agreement (FIA) with PROMISE JOBS as a condition of FIP eligibility unless exempt. FIA-responsible participants must follow the terms of their signed FIA to continue receiving FIP.

HHS Income Maintenance (IM) workers determine whether each member of a FIP household must sign and participate in FIA activities or if any member meets one of the exemption criteria described under [Who is Exempt from PROMISE JOBS Participation](#).

IM workers refer the following persons to the PROMISE JOBS program unless they are exempt from participation:

- All FIP applicants who appear eligible for FIP.
- Each person in the FIP eligible group receiving FIP.
- Any parent living with a child applying for or receiving a FIP grant.

Persons Who Must Be Referred to PROMISE JOBS as FIA-Responsible (Unless Exempt)

All applicants **who appear eligible for FIP** and all persons included in the FIP grant, specifically:

- Any parent
- Any needy specified relative
- Any child aged 16 or older who is not in school
- Any minor parent, whether or not in school

Any ineligible parent living with a child applying for or receiving FIP, such as a:

- Parent ineligible for failure to provide a social security number
- Parent ineligible for failure to apply for all benefits
- Qualified alien parent ineligible due to the five-year bar
- Parent receiving a foster care or subsidized adoption payment or a Preparation for Adult Living (PAL) stipend

Iowa Workforce Development (IWD) provides PROMISE JOBS services to FIP applicants and participants. The IM refers the FIA-responsible person to IWD.

Procedure: IM workers refer applicants and participants who are not exempt to PROMISE JOBS through entry of an FIA-responsible JOBS code in the ABC system, by scheduling an FIA appointment for applicants, and by taking other actions as specified in the following sections.

To share referral information, HHS Division of Information Technology (DoIT) staff provide a daily data file to IWD. The data file includes new PROMISE JOBS referrals and updated information on existing and recently closed referrals. IWD processes the data file into their case management system. Some items included in the daily data file are:

- Applicant/participant name, address, State ID, and social security number.
- IM or team worker number.

- Referral status/JOBS code.
- FIP and SNAP Status and amount of benefit.

NOTE: The ABC system only processes PROMISE JOBS referrals for persons who have a valid social security number. IM workers must manually refer persons who do not have a social security number. This includes aliens who are not exempt whose social security number has been entered as 999-99-9999 pending application for or receipt of a number. See [Referring Persons Without a Social Security Number](#) for more information.

Local PROMISE JOBS offices are responsible for managing and tracking new applicant referrals and for distributing the referral appointments to a PROMISE JOBS worker.

PROMISE JOBS is also responsible for managing and tracking participants who lose exempt status while receiving FIP and whether the participant contacts PROMISE JOBS to schedule an FIA appointment.

See [Service Upon Referral](#) for more information regarding PROMISE JOBS procedures.

Communicate with IM supervisory staff to determine any needed local referral procedures beyond those specified in this chapter. For example, PROMISE JOBS may need immediate notification when IM schedules an FIA appointment for the same day.

The IM worker makes referrals to PROMISE JOBS differently for applicants than for FIP participants who become FIA-responsible while on FIP. Procedures also differ for referring persons in an LBP, persons in a grace period, and persons requesting FIP beyond 60 for a hardship exemption.

The following sections give more information on referring applicants and participants:

- Referring Applicants
- Referring Participants
- Who is Exempt From PROMISE JOBS

Referring Applicants

Legal reference: 441 IAC 41.24(239B), and 93.3(239B)

Policy: Applicants who are not exempt must meet with PROMISE JOBS to write and sign an FIA as a condition of FIP eligibility.

The FIA must be signed before FIP approval. Failure to write and sign an FIA results in denial of FIP for the entire family or for the person who failed and any of their children, depending on the relationship of the person who failed to the rest of the FIP household. An applicant's failure to write and sign an FIA does not result in imposition of an LBP.

Once FIP is approved, as a FIP participant, the person must follow the requirements of the FIA to continue receiving FIP. Failure to follow the requirements of the FIA results in imposition of a limited benefit plan (LBP) as described at [Limited Benefit Plan \(LBP\)](#).

Procedure: The IM worker refers FIP applicants who are FIA-responsible to PROMISE JOBS by:

- Accessing PJCase Calendar and scheduling an appointment for the applicant to meet with PROMISE JOBS to write and sign an FIA for the earliest time possible based upon a schedule provided by the local PROMISE JOBS office;
- Completing form 470-3897, *FIA Appointment*, and issuing a copy to the applicant; and
- Pending the case on ABC no later than the day of the FIP interview;
- Entering the applicable “applicant” JOBS referral code in ABC after the FIP interview.

IM will make referrals no earlier than the date of the application interview. IM will only refer applicants who appear to be eligible for FIP.

For an alien applicant, IM will not refer the alien to PROMISE JOBS until IM has determined from the alien documentation if the alien is potentially eligible for FIP and PROMISE JOBS services. See [Alien Exemption](#) for more information.

The IM worker must schedule all FIA appointments at the earliest time available and within ten days of the date of referral unless the applicant asks for an appointment outside of this time frame.

For this reason, when providing the local FIA appointment schedule, PROMISE JOBS must provide enough appointment times to:

- Accommodate the number of FIP applications filed and
- To allow all applicants to be offered an appointment within ten days of the referral.

PROMISE JOBS is responsible for any rescheduling of the FIA appointment after the initial appointment is scheduled by IM.

Allow applicants at least 15 minutes from the scheduled appointment start time to appear for the FIA appointment before considering that the applicant has failed to attend the appointment.

If the applicant signs an FIA, PROMISE JOBS will report this through entry in the PJCase system. IM will proceed with the FIP eligibility determination.

If the applicant does not appear for the FIA appointment or fails to sign an FIA, PROMISE JOBS will report this through entry in the PJCase system. If the person is a FIP parent and the IM worker pended the application in ABC, PJCase will generate entries to deny the FIP application. Otherwise, the IM worker must make entry in ABC to deny the application.

See [Service Upon Referral](#) for more information.

If an FIA-responsible applicant fails to sign an FIA, FIP eligibility is affected as follows:

Person who failed to sign an FIA	IM Action
Parent	In two-parent households with a common child, if both parents are FIA-responsible and either fails to sign the FIA, IM denies FIP for the entire household.
	In two-parent households with no common child, if both parents are FIA responsible and one fails to sign the FIA, IM denies FIP for only the parent who fails and their children.
Child (not a parent)	IM denies FIP for the child. The other household members may be eligible if there is an eligible child.
Minor Parent	IM denies FIP for the minor parent and any child of the minor parent. The other household members may be eligible if there is an eligible child.
Needy specified relative	IM denies FIP for the specified relative. The children may be eligible.
Stepparent included as an optional household member	IM denies FIP for the stepparent. The other household members may be eligible.

Adding a New Person to An Active FIP Household

Legal reference: 441 IAC 41.24(239B), 93.3(239B)

Policy: When a participant family requests to add a new person, who is not exempt from PROMISE JOBS referral, to the FIP eligible group, the new person must sign an FIA before being approved for FIP.

A written FIP application and eligibility interview is not required for IM to add a new person to the active FIP household.

Procedure: If the new person is FIA-responsible, it appears the person is potentially eligible for FIP, and the existing household will remain eligible with the person included, IM will follow the same steps described at [Referring Applicants](#) to schedule the FIA appointment and to refer the new FIA-responsible person to PROMISE JOBS:

- ABC will not allow IM to pend the applicant when the case is active, and
- IM will not discuss PROMISE JOBS program requirements with the applicant since IM does not complete an eligibility interview in this situation. PROMISE JOBS will provide the requirements during orientation.

Failure to attend the FIA appointment and write and sign an FIA results in denial of FIP for the person. If the new person is a parent, failure to attend the FIA appointment or to write and sign an FIA may result in cancellation of the active FIP case.

See [14-O, Pre-FIP Entries](#) for more information on PJCase entries.

Referring Participants

Legal reference: 441 IAC 41.24(239B), 93.3(239B)

Policy: Participants who lose exempt status and become FIA-responsible while receiving FIP must meet with PROMISE JOBS to write and sign an FIA to continue receiving FIP. Failure results in imposition of an LBP for the entire family or for the person who failed and any of their children, depending on the relationship of the person who failed to the rest of the FIP family.

An exempt person becomes FIA-responsible while on FIP when:

- A person aged 16 to 18 who is not a parent drops out of school, or
- A minor becomes a parent, or
- An SSI recipient loses eligibility for SSI.

Procedure: The IM worker refers participants who lose exempt status while receiving FIP by changing the JOBS referral code in the ABC system to the applicable “participant” code.

IM's entry causes the PJCase system to send form 470-3106, *FIA Referral for Mandatory Participants*. This form explains that the person must:

- Comply with the PROMISE JOBS program to continue receiving FIP and
- Contact PROMISE JOBS within 10 days to schedule an appointment to begin the FIA process.

Upon receipt of a referral of a participant who becomes FIA-responsible, PROMISE JOBS must track the referral and the 10-day period.

If the participant contacts PROMISE JOBS within 10 days, PROMISE JOBS must schedule the FIA appointment. If the participant does not contact PROMISE JOBS within 10 days, PROMISE JOBS must send the participant a reminder. See [FIP Participants Whose Referral Status Changes to FIA-Responsible](#) for more information.

The following sections give more information on the procedures for referring applicants and participants in specific situations:

- [Referring battered aliens](#)
- [Referring persons in a limited benefit plan](#)
- [Referring persons during FIP grace period](#)
- [Referring families who are requesting FIP beyond 60 months](#)
- [Referring persons without social security numbers](#)
- [Referring persons with disabilities](#)

Referring Battered Aliens

Legal reference: 441 IAC 41.23(4)-(5), 41.24(239B), 93.3(239B)

Policy: Battered aliens are subject to the same PROMISE JOBS and FIA requirements as other FIP applicants and participants. See 4-L, [Battered Aliens](#).

Procedure: IM will make the referral to PROMISE JOBS in the same way as any other FIP applicant or participant. See [Referring Applicants](#) and [Referring Participants](#).

EXCEPTION: If the person does not yet have a social security number, the ABC system will not be able to transmit the referral information to PROMISE JOBS. Follow the procedures described at [Referring Applicants](#) and [Referring Participants](#). The IM will note in the Comments section of the PJCase Calendar Appointment screen that the person is a battered alien who does not yet have a social security number. IM will include the person's address and date of birth and the names and ages of the children in the home (regardless of their FIP status) or send you a copy of form 470-3897, *FIA Appointment*.

Referring Persons in a Limited Benefit Plan

Legal reference: 441 IAC 41.24(239B), 93.16(239B)

Policy: A person who chooses a **first** limited benefit plan (LBP) may reconsider and end the LBP at any time from the date of the *Notice of Decision* imposing the LBP. To reconsider, the person who chose the LBP must sign another FIA. The family must reapply for FIP if the person who chose the LBP cannot sign an FIA prior to the effective date of the LBP.

When a person chooses a **subsequent** LBP, the family members impacted by the LBP are ineligible for FIP for a minimum of six months. Once the *Notice of Decision* to impose a subsequent LBP is issued, the LBP cannot be reconsidered until the six-month period of ineligibility has expired.

Procedure: To reconsider an LBP, the person may contact PROMISE JOBS or the IM worker. The needed action varies with the specific situation.

First LBP:

When a person contacts PROMISE JOB before the effective date of a **first** LBP and there is an available **FIA** appointment that the person can attend before the effective date of the LBP:

- Schedule an FIA appointment for the person using the PJCase Calendar,
- Complete and provide form 470-3897, *FIA Appointment* to the person.
- Inform IM so IM can enter the applicable “JOBS” referral code in ABC.

If there is not an available appointment before the effective date of the LBP or the person makes contact on or after the effective date of the LBP, do not schedule the person for an FIA appointment. Tell the person that they must reapply for FIP.

Document and report the contact to the IM worker. IM will send the person an application. If the person reapplies for FIP, the IM worker will refer the applicant to PROMISE JOBS as described at [Referring Applicants](#).

Subsequent LBP:

When a person in a **subsequent** LBP makes contact after the *Notice of Decision* has been issued:

- If the contact is made before month 6 of the ineligibility period, explain that the LBP cannot be reconsidered and FIP eligibility does not exist.

- If the contact is made in month 6 of the ineligibility period or after the six-month ineligibility period of a subsequent LBP has ended, tell the person that they must reapply for FIP with HHS. IM will do the same if the person contacts IM. Do not schedule the person for an FIA appointment until the person files an application.

If the person reapplies for FIP, the IM worker will refer the applicant to PROMISE JOBS as described at [Referring Applicants](#).

If the person reapplies for FIP in month 6 of the ineligibility period, IM will schedule an appointment that is after the last day of the six-month ineligibility period.

Refer to [Reconsidering an Active Limited Benefit Plan \(LBP\)](#) for more information on actions a person must take to reconsider an LBP.

Referring Persons During FIP Grace Period

Legal reference: 441 IAC 40.23(4), 41.24(239B), 93.3(239B)

Policy: When IM denies a FIP application for failure to provide requested information or for failure to attend the FIP application interview, IM will allow the applicant a 14 calendar day “grace period” to correct the reason for denial. IM will reconsider FIP eligibility without a new application if the applicant corrects the reason for denial and takes all action to establish eligibility within 14 days of the date on the Notice of Decision denying the application. This includes:

- Providing all necessary information to establish eligibility, including verification of any changes,
- Signing the required FIA if one has not yet been signed,

The grace period does not apply to FIP applications that are denied for reasons other than failure to provide requested information or failure to attend the FIP application interview. The grace period **does not** apply when a FIP application is denied for failure to attend an FIA interview or for failure to complete the required hours of activity needed to end a subsequent LBP.

Procedure: When IM denies a FIP application for failure to provide requested information or for failure to attend the application interview, consider the specific situation as follows to determine how to proceed:

FIA Signed Prior to Denial (No Subsequent LBP):

IM will not re-refer the applicant to PROMISE JOBS during the grace period if the applicant signed an FIA before the application was denied. Reinstate the FIA if the applicant corrects the reason for the denial, takes all other necessary action within the grace period, and IM determines FIP eligibility exists.

EXAMPLE:

FIP applicant Ms. A signs an FIA on November 30. PROMISE JOBS enters that an FIA was signed in PJCase and PJCase sends an email to the IM worker. Ms. A fails to provide requested verification of income.

On December 1, the IM issues a notice denying the application and PJCase notifies PROMISE JOBS of the FIP denial. The denial notice is dated December 2. The grace period ends December 16.

Ms. A provides the verification to IM on December 10 and there have been no other changes in the family's circumstances. On December 11, the IM worker reprocesses the application and approves FIP effective December 10. PJCase sends an email to the PROMISE JOBS worker as listed in PJCase to inform the worker of the FIP approval. On December 11, PROMISE JOBS begins case management of the FIA.

FIA Not Signed Prior to Denial (No Subsequent LBP) – Available Appointment Within Grace Period:

IM will schedule the FIA appointment and refer the applicant to PROMISE JOBS as described at [Referring Persons to PROMISE JOBS](#).

Exception: During the application grace period, IM is not required to re-pend the application or to enter an applicant JOBS referral code in the ABC system. However, both of these actions are recommended.

If IM re-pends FIP and enters an applicant JOBS referral code in ABC:

- ABC sends a system referral to the PJCase system.
- PROMISE JOBS will enter that an FIA was signed or not signed in PJCase.
 - PJCase will send an email to inform you if the FIA-responsible person signed an FIA or did not sign an FIA.
 - PJCase will deny the FIP application in ABC if the FIA-responsible person fails to appear for the appointment or does not sign an FIA.

If IM does not re-pend FIP:

- The ABC system will not allow IM to enter an applicant JOBS referral code for the FIA-responsible person or send a system referral to the PJCase system. IM will explain that FIP is not pending in ABC and that a system referral will not be sent in the Comment section of the PJCase Calendar Appointment Screen.

- PROMISE JOBS will not be able to use PJCase to inform IM if the FIA-responsible person signed an FIA or did not sign an FIA. Instead, PROMISE JOBS will send IM an email to report that:
 - The FIA-responsible person signed an FIA and to provide the date the FIA was signed, or
 - The person did not sign an FIA.
- If the person does not sign an FIA, IM will need to make entry in ABC to deny FIP.

FIP applicant Ms. B fails to provide verification of income that was requested by IM. The IM worker issues a notice denying the application on December 1. The date on the denial notice is December 2. The grace period ends December 16. IM did not schedule an FIA appointment or refer Ms. B to PROMISE JOBS as Ms. B did not appear eligible for FIP. PJCase does not send notification to IWD as Ms. B was not referred to PROMISE JOBS.

Ms. B provides the missing verification on December 5 and appears eligible for FIP. The IM worker schedules an FIA appointment for December 15.

Scenario A. IM re-pends FIP with applicable applicant JOBS code in ABC and one of the following applies:

- Ms. B appears for the FIA appointment and signs an FIA. PROMISE JOBS enters the FIA Signed date in PJCase. PJCase sends an e-mail to notify IM. On December 7, IM approves FIP as of December 5, the date Ms. B provided the missing verification.
- Ms. B does not appear for the FIA appointment. PROMISE JOBS makes entry that an FIA was not signed in PJCase. PJCase denies the FIP application and sends an e-mail to notify IM.

Scenario B. IM does not re-pend FIP in ABC and one of the following applies:

- Ms. B appears for the FIA appointment and signs an FIA. PROMISE JOBS sends IM an e-mail that an FIA was signed. On December 7, IM approves FIP as of December 5, the date she provided the missing verification. PROMISE JOBS enters the FIA signed date in PJCase.
- Ms. B does not appear for the FIA appointment. PROMISE JOBS sends IM an email to report the failure. The IM worker makes entry to deny the application.

Active Subsequent LBP:

IM determines if it is reasonable for the applicant to cure the reason for denial and complete the actions needed to end the subsequent LBP by the end of the 14-day grace period, including:

- Signing an FIA if one has not yet been signed and
- Completing any remaining hours of PROMISE JOBS activity as stated in the FIA. IM may contact PROMISE JOBS for help with this determination.

FIA not signed prior to denial:

- IM determines if there is an FIA appointment available early enough in the 14-day period that the applicant will still have enough time to complete the required 20 hours of activity.
- PROMISE JOBS may require fewer than 20 hours of activity if the applicant has problems or barriers that prevent them from participating at that level.
- IM will tell the applicant to reapply if it is not reasonable for the applicant to complete all needed action by the end of the 14-day period.
- If IM determines it is reasonable for the applicant to complete all needed action within the 14-day period:
 - IM will schedule the FIA appointment and refer the applicant to PROMISE JOBS as described at Referring Persons in a Limited Benefit Plan (LBP). Exception: During the application grace period, IM is not required to re-pond the application or enter the JOBS referral code in the ABC system. However, both of these actions are recommended.
 - IM will send PROMISE JOBS an email that explains that the application is being reconsidered and that gives PROMISE JOBS the last day of the grace period.
 - PROMISE JOBS will notify IM of the applicant's LBP status as follows:
 - If the applicant signs an FIA and completes the required activity, PROMISE JOBS will make entry in PJCase to stop the LBP. PJCase will send an email to IM. IM will redetermine FIP eligibility.
 - If the applicant abandoned their reconsideration and IM referred the applicant with a reconsideration JOBS code, PROMISE JOBS will make an Abandon Reconsideration entry in PJCase. The PJCase email will explain if the system denied the application, or if the IM worker needs to deny the application.
 - If the applicant abandoned their reconsideration and is not referred with a reconsideration JOBS code, PROMISE JOBS will send an email to IM. IM needs to deny the application.

FIA signed prior to the FIP denial and the applicant has not yet completed hours of activity needed to end the LBP:

IM will not re-refer the applicant to PROMISE JOBS during the grace period if the FIA was signed before the application was denied. The FIA will be reinstated if the applicant corrects the reason for the denial, takes all other necessary action within the grace period, and IM determines eligibility exists.

IM will determine if it is reasonable for the applicant to cure the reason for denial and complete the remaining hours of activity within the 14-day period. IM may contact PROMISE JOBS for help with this determination:

- If IM determines it is not reasonable for the applicant to complete all needed action by the end of the 14-day period, IM will tell the applicant to reapply.
- If IM determines it is reasonable for the applicant to complete all needed action within the 14-day period, IM will send PROMISE JOBS an email that explains that the application is being reconsidered and gives PROMISE JOBS the last day of the grace period.

PROMISE JOBS will notify IM of the applicant's status as follows:

- If the applicant signs an FIA and completes the required activity, PROMISE JOBS will make entry in PJCase to stop the LBP. PJCase will send email to IM. IM will redetermine FIP eligibility.
- If the applicant abandoned their reconsideration, PROMISE JOBS will send IM an email. IM worker needs to deny the application.

Remember: The grace period does not apply when the application was denied for failure to sign an FIA or for failure to complete the required hours of activity needed to end a subsequent LBP.

1. Ms. C chose a subsequent LBP with a six-month period of ineligibility that ended March 31. Ms. C reapplies for FIP on May 1. On May 4, IM refers Ms. C to PROMISE JOBS, schedules an FIA appointment and requests information that is due May 14.

Ms. C signs an FIA on May 9 agreeing to complete 20 hours of activity in 30 days. PROMISE JOBS begins case management by authorizing a transportation payment and child care if needed for the 20 hours of activity. On May 15, IM denies the application for failure to provide information with an NOD dated May 16. PROMISE JOBS discontinues case management. The grace period ends May 30.

Ms. C provides the verification on May 24. IM informs Ms. C that she must complete the 20 hours of PROMISE JOBS activity and provide any needed verification to PROMISE JOBS by May 30 for IM to reconsider the application. IM also informs PROMISE JOBS via e-mail that the May 1 application is being reconsidered and that Ms. C needs to complete her 20 hours of PROMISE JOBS activity by May 30 or the application will be denied. IM does not re-pond FIP. PROMISE JOBS resumes case management.
 - If Ms. C completes her 20 hours of activity, PROMISE JOBS will stop the LBP in PJCase, which sends an email to IM. IM will redetermine FIP eligibility.
 - If Ms. C does not complete her 20 hours of activity, PROMISE JOBS will notify IM via email that the applicant abandoned their reconsideration. IM will issue an NOD saying that the application remains denied due to the LBP.
2. Ms. D chose a subsequent LBP with a six-month period of ineligibility that ended May 31. Ms. D reapplies for FIP on June 7. On June 9, IM refers Ms. D to PROMISE JOBS and schedules an FIA appointment for June 14 and requests that Ms. D provide verification of resources by June 19.

Ms. D fails to appear for the FIA appointment on June 14. On June 14, PROMISE JOBS enters in PJCase that Ms. D failed to sign an FIA. PJCase denies the application for failure to sign an FIA with an NOD dated June 15. Ms. D provides the resource verification on June 19. The application grace period does not apply in this situation. Ms. D must file a new application to get FIP assistance.

Referring Hardship Exemption Families

Legal reference: 441 IAC 41.24(239B), 41.30(3)"g", 93.3(239B)

Policy: Families that are subject to the 60-month FIP limit may receive FIP beyond that limit only if they request and are determined eligible for a hardship exemption and meet all other FIP requirements.

The hardship determination is a one or two-step process:

- The IM worker is responsible for determining whether the family has a hardship condition that affects its ability to be self-supporting.
- For FIA-responsible "adults", PROMISE JOBS is responsible for determining how the hardship issues will be addressed in the six-month FIA.

An "adult" is:

- A parent in the home with the child, even if excluded from the FIP grant.
- The parent's spouse in the home with the parent and child, whether or not the stepparent is included in the grant.
- A needy non-parental specified relative included in the FIP grant with the child.
- A minor parent in the home who is payee for the minor's own FIP case, even if the parent is excluded from the grant.

A family:

- Without an FIA-responsible person has to meet step 1.
- With an FIA-responsible person has to meet both steps before the exemption request can be granted.

A hardship exemption is limited to six consecutive calendar months. Families may request and be granted more than one hardship exemption period if they otherwise qualify for the exemption and meet FIP eligibility requirements. A new FIA and a new hardship exemption determination are required for each subsequent hardship exemption period.

The family is required to develop and sign a six-month FIA **before** FIP can be approved. Therefore, failure to develop and sign an FIA results in denial of the family's hardship exemption request and the FIP application if applicable rather than imposition of an LBP.

Procedure: If the IM worker determines the family meets hardship criteria, the IM worker refers the FIA-responsible adults of the family by following the procedures described in [Referring Applicants](#) or [Referring Participants](#) within one working day. IM will use the JOBS referral codes that identify hardship “applicants” and “participants” and whether the applicant is in an active LBP. In addition, the IM worker will send the following to PROMISE JOBS:

- Form 470-3876, *Hardship Exemption Determination*, with Part A completed.
- A copy of form 470-3826 or 470-3826(S), *Request for FIP Beyond 60 Months*.
- Evidence to support the hardship determination.
- If the family has an active service case, the completed form 470-3884, *Hardship Exemption: Service Information*.

Families that are applying or approved for a hardship exemption must meet all other FIP requirements. Therefore, in addition to the adults in the home, other FIA-responsible persons in the home must sign a six-month FIA and participate in PROMISE JOBS activities; e.g., a minor parent who is a child on the adult’s FIP case, or a 16 to 18-year-old who is not in school.

If the family is applying for an FIA-responsible minor parent, the minor parent must sign a separate FIA as a condition of FIP eligibility for the minor parent and any child of the minor parent. IM will refer the minor parent as described in [Referring Applicants](#). If IM approves a hardship exemption for the adult and the remainder of the family:

- Include the minor parent and any child of the minor parent in the eligible group if the minor parent signs an FIA and is otherwise eligible.
- Deny FIP for the minor parent and any child of the minor parent if the minor parent does not sign an FIA.

If the family is applying for an FIA-responsible child who is not a parent, the child must sign a separate FIA as a condition of FIP eligibility. IM will refer the child as described at [Referring Applicants](#). If IM approves a hardship exemption for the adult and the remainder of the family:

- Include the minor parent and any child of the minor parent in the eligible group if the minor parent signs an FIA and is otherwise eligible.
- Deny FIP for the minor parent and any child of the minor parent if the minor parent does not sign an FIA.

If any of the FIA-responsible adults or other persons do not appear for the FIA appointment or fail to sign an FIA, PROMISE JOBS must report this through entry in the PJCase system. If the person is a FIP parent and the IM worker pended the application in ABC, PJCase will deny the FIP application. Otherwise, the IM worker must make entry in ABC to deny the FIP application. Refer to [Hardship Exemption](#) for more information.

Referring Persons Without a Social Security Number

Legal reference: 441 IAC 41.24(239B), 93.3(239B)

Policy: If a person does not have a social security number, the ABC system **will not** be able to transmit PROMISE JOBS referral information to IWD. Thus, IM workers must manually refer persons who do not have a social security number. This includes aliens who are not exempt whose social security number has been entered in ABC as 999-99-9999 pending application for or receipt of a number, such as:

- New alien arrivals
- Battered aliens
- Refugees

Procedure: To refer an FIA-responsible person who does not yet have a social security number, the IM worker will follow the procedures described at [Referring Applicants](#) and [Referring Participants](#). However, PROMISE JOBS will not receive a systematic referral in the daily data file described at [Referring Persons to PROMISE JOBS](#).

The IM worker will inform you if a person does not yet have a social security number by making a note in the Comments field of the PJCase Calendar Appointment screen when scheduling the FIA appointment. If needed, establish any additional procedures locally. This may consist of a phone call, an E-mail, or a written memo to the PROMISE JOBS office or to a designated PROMISE JOBS contact person.

Upon receipt of a manual referral:

- For applicants, follow your usual procedures as described at [Referring Applicants](#).
- For participants whose referral status has changed from exempt to FIA-responsible, send the referred person a copy of *FIA Referral for Mandatory Participants*, form 470-3105. Track the 10-day response due date as described at [Referring Participants](#).

Referring Persons With Disabilities

Legal reference: 441 IAC 41.24(239B), 93.3(239B)

Policy: Persons who claim a disability are subject to the same PROMISE JOBS and FIA requirements as other FIP applicants and participants unless exempt.

Procedure: IM workers will refer persons who claim a disability to PROMISE JOBS in the same manner as for any other FIP applicant or participant, unless they are exempt due to receipt of Supplemental Security Income (SSI) benefits for their own disability or blindness. IM will refer disabled persons who are not receiving SSI even when they claim that they are not able to participate with PROMISE JOBS.

When a person on FIP claims to be unable to engage in substantial activity due to a disability that is expected to last for 12 consecutive months or expected to result in death, the IM worker will require the person to apply for and accept Social Security Disability (SSD) and SSI benefits. For more information, see 4-C, [Benefits From Other Sources](#).

The IM worker will use local communication procedures to inform PROMISE JOBS when a referred person:

- Claims a disability, or
- Applies for SSD or SSI benefits.

PROMISE JOBS staff will help referred persons with a disability to develop an FIA that meets their individual needs and abilities. If a person claims a limitation due to a disability, ask the person to provide medical evidence of the limitation. PROMISE JOBS will consider the limitation and any other problems or barriers resulting from the disability when determining the person's level of participation. For information regarding PROMISE JOBS sharing disability information with IM, see [Reporting Disability Information to IM](#).

Who Is Exempt from PROMISE JOBS Participation

Legal reference: 441 IAC 41.24(2)(239B)

Policy: The following persons are exempt from PROMISE JOBS referral and participation:

- Child who is under the age of 16 and is not a parent.
- Supplemental Security Income (SSI) recipient
- Child aged 16 to 19, is not a parent, and attends school full-time
- Non-citizen who is not a qualified alien.

Procedure: The IM worker will determine the referral status of each person applying for or receiving FIP and each parent living in the home of a child applying for or receiving FIP and document this in the case record. IM will enter the referral status of each person in the ABC system.

HHS will not include data on persons coded as exempt in the daily data file sent to IWD each night unless the person was previously referred to PROMISE JOBS as FIA-responsible. See [Referring Persons to PROMISE JOBS](#) for more information on the daily data file.

The PJCase system sends form 470-2758, *Participation No Longer Required*, when a participant's referral status is changed from FIA-responsible to exempt.

The following sections explain the requirements under each exemption.

School Attendance Exemption

Policy: A person who is aged 16 to 19, is **not a** parent and is attending elementary or secondary school or the equivalent level of vocational or technical school on a full-time basis is exempt from PROMISE JOBS participation except when the person:

- Is receiving FIP; and
- Was referred to PROMISE JOBS and returned to school after signing an FIA that remains in effect.

Procedure: When determining exemption based on school attendance, IM considers the child's school attendance to be full-time when the child is not present during school vacations or because of illness, convalescence, or family emergencies.

A child meets the definition of regular school attendance until the child has been officially dropped from the school rolls. IM accepts the school's statement and definition regarding full-time status. Participating in a correspondence school does not exempt a child from PROMISE JOBS.

IM considers a child who is schooled at home as "enrolled in school" and exempt from PROMISE JOBS referral provided:

- The home schooling arrangement is certified by the school system. Obtain any needed verification of student or attendance status from the school system that certified the arrangement. A signed release from the parent or caretaker is needed (the same as required when a child is enrolled in a regular school setting, OR

- The parent states that the parent is home schooling the child and the parent considers the instruction to be “full-time” and the home schooling will lead to a diploma or certificate. A high school equivalency diploma or a certificate that is created by the parent is acceptable.

A child on FIP aged 16 to 19 who is referred to PROMISE JOBS remains obligated to a signed FIA as long as the person remains eligible for FIP, regardless of school attendance. IM will not exempt a person aged 16 to 19 who has signed an FIA if the person returns to school.

FIP applicants aged 16 to 19 who are not parents and who have chosen an active LBP must take action to reconsider the LBP to become FIP eligible, regardless of their school attendance status. See [Referring Persons in a Limited Benefit Plan](#) and [Stopping a Limited Benefit Plan](#) for more information.

SSI Exemption

Policy: A person who is receiving Supplemental Security Income (SSI) benefits due to their own disability or blindness is exempt from PROMISE JOBS referral.

Procedure: IM exempts SSI recipients from PROMISE JOBS referral.

IM refers disabled persons who are not receiving SSI as described at [Referring Persons With Disabilities](#).

PROMISE JOBS will notify IM when a referred person reports to PROMISE JOBS that they have a disability that is expected to last for more than 12 months or to result in death, following the procedures described at [Reporting Disability Information to IM](#).

Alien Exemption

Policy: A person who is not a U.S. citizen or not a qualified alien is exempt from PROMISE JOBS referral and participation as the person is not eligible for PROMISE JOBS services.

Procedure: The IM worker exempts from PROMISE JOBS referral persons who are not U.S. citizens and not a qualified alien as defined in [4-L, Alien Status](#).

Examples of immigration statuses held by aliens who are not qualified aliens and **not** eligible for PROMISE JOBS services include:

- Undocumented aliens.
- Nonimmigrants under the INA.
- Aliens paroled into the U.S. under INA Section 212(d)(5) **for less than one year**.
- Temporary residents under the Immigration and Control Act.

- Aliens in deferred status.
- Aliens with protected status, such as “permanently residing in the U.S. under color of law.”

Service Upon Referral

Legal reference: 441 IAC 41.24(239B) and 93.3(239B)

Policy: Upon referral of new applicants and participants, PROMISE JOBS must meet with the person to:

- Provide orientation to the PROMISE JOBS program,
- Complete an initial assessment of the person and the family, and
- Develop an FIA for the applicant or participant to sign.

Procedure: If the applicant or participant attends the FIA appointment:

- Provide an overview of the PROMISE JOBS program and orientation services as described at [Orientation](#).
- Meet individually with the applicant or participant to complete form 470-0806, *PROMISE JOBS Stepping Stones to Family Success*. Assist the applicant or participant with completion of the *Self-Assessment* form when needed.
- Use the information from the Stepping Stones form and other information provided by the applicant or participant to complete an initial assessment to determine the individual family’s goals, needs and the appropriate activities. Develop the FIA with the information obtained during this assessment.

The following sections give more information on policies and procedures that apply upon referral:

- [FIP Applicants](#)
- [FIP Participants Who Lose Exempt Status and Become FIA-Responsible](#)
- [Orientation for PROMISE JOBS and the FIA](#)
- [Arranging for Services](#)
- [Beginning PROMISE JOBS Participation](#)

See [Assessment](#) for more information on assessment that occurs prior to writing an FIA. Refer to [Family Investment Agreement](#) in this chapter for more information on the requirements for writing an FIA.

FIP Applicants

Legal reference: 441 IAC 41.24(239B) and 93.3(239B)

Policy: As a condition of eligibility to receive FIP, all FIA-responsible persons in the potentially eligible FIP household must sign a valid FIA before the IM worker can approve the family's application for FIP.

Procedure: Make every attempt to complete the orientation process, initial assessment, and obtain a signed FIA during the assigned appointment time to allow IM to make a decision on the FIP application. If additional assessment or information is needed to finalize the FIA, write these needs into the FIA and obtain a signature. Renegotiate the FIA if needed once the additional assessment is complete or you receive the additional information.

When a phone interview is necessary to accommodate a family's situation, provide orientation, complete assessment, and develop the FIA during the phone interview or, if available, use a secure virtual option that does not identify the applicant to other participants. Do not waive any requirements of orientation. The family will need to sign and return the FIA before you can notify the IM worker of cooperation. Allow the family at least 10 calendar days to provide the signed FIA. When the phone interview is complete, either:

- Mail orientation materials and a copy of the completed FIA to the family for the applicant to sign and return or,
- Send a pdf of FIA and orientation materials electronically to the applicant when the applicant is willing to provide an email address.

When PROMISE JOBS sends the FIA and orientation materials to the applicant via email, the email must state:

I have attached your Family Investment Agreement (FIA) for the PROMISE JOBS program to this email. You must sign and return the FIA by _____ to get FIP assistance. You may sign the FIA by:

- Printing, signing, taking a photo of your signature, and sending a copy of the photo to your PROMISE JOBS worker via email; OR
- Typing your first and last name following your answers to the following questions.

You must **copy and answer** the following questions in a return email.

1. Have you reviewed the contents of the FIA attached to this email?
2. Do you understand that by electronically sending a photo of your signature or typing your first and last name at the end of your return email, you are indicating you approve of and agree with the FIA as of the date of your return email?

When the FIA appointment is scheduled as a phone appointment with PROMISE JOBS to call the applicant, call the applicant at the scheduled start time. If the applicant does not answer and it is possible to leave a message, leave a message that identifies yourself, your phone number, and ask the applicant to call you back within 5 minutes. If you do not receive a call from the applicant, call the applicant again in 10 minutes from the scheduled start time. You may consider that the applicant has failed to attend the FIA appointment if you do not reach the applicant after two attempts.

When the FIA appointment is scheduled as a phone appointment with the applicant to call PROMISE JOBS, you must be at your phone prior to the scheduled start time and remain at your phone for 15 minutes from the scheduled start time. You may consider that the applicant has failed to attend the FIA appointment if you do not receive a call within 15 minutes of the scheduled start time.

See [Orientation](#) for information on the contents and requirements of orientation.

When mailing orientation information, allow the applicant 10 calendar days from the date you mail orientation information, form 470-3104, *Your FIA Rights and Responsibilities*, and the FIA, to return the signed FIA and *Your FIA Rights and Responsibilities*. Include a letter explaining what is needed, the date the information is due and that the FIP application will be denied if all requested information is not returned. Enclose a self-addressed stamped envelope.

When the applicant signs an FIA, make entries in PJCase and the IowaWORKS system within one working day of the applicant's FIA appointment or receipt of a signed FIA and *Your FIA Rights and Responsibilities* that were mailed to the applicant after a phone interview.

Processing of the PJCase entry:

- Sends an E-mail to the IM worker, alerting the IM worker to proceed with the FIP eligibility determination.
- Records the ACTIVE FIA DATE in the PJCase system.
- Changes the "applicant" JOBS code to a valid "participant" code, if FIP is pending, or to the "unknown" status code, if FIP is not pending. The IM worker will update the "unknown" code to a valid "participant" code if FIP is approved.

When the applicant does not appear for the FIA appointment or does not sign an FIA, make entries in PJCase as soon as you determine that the applicant is not complying. Processing of the PJCase entry:

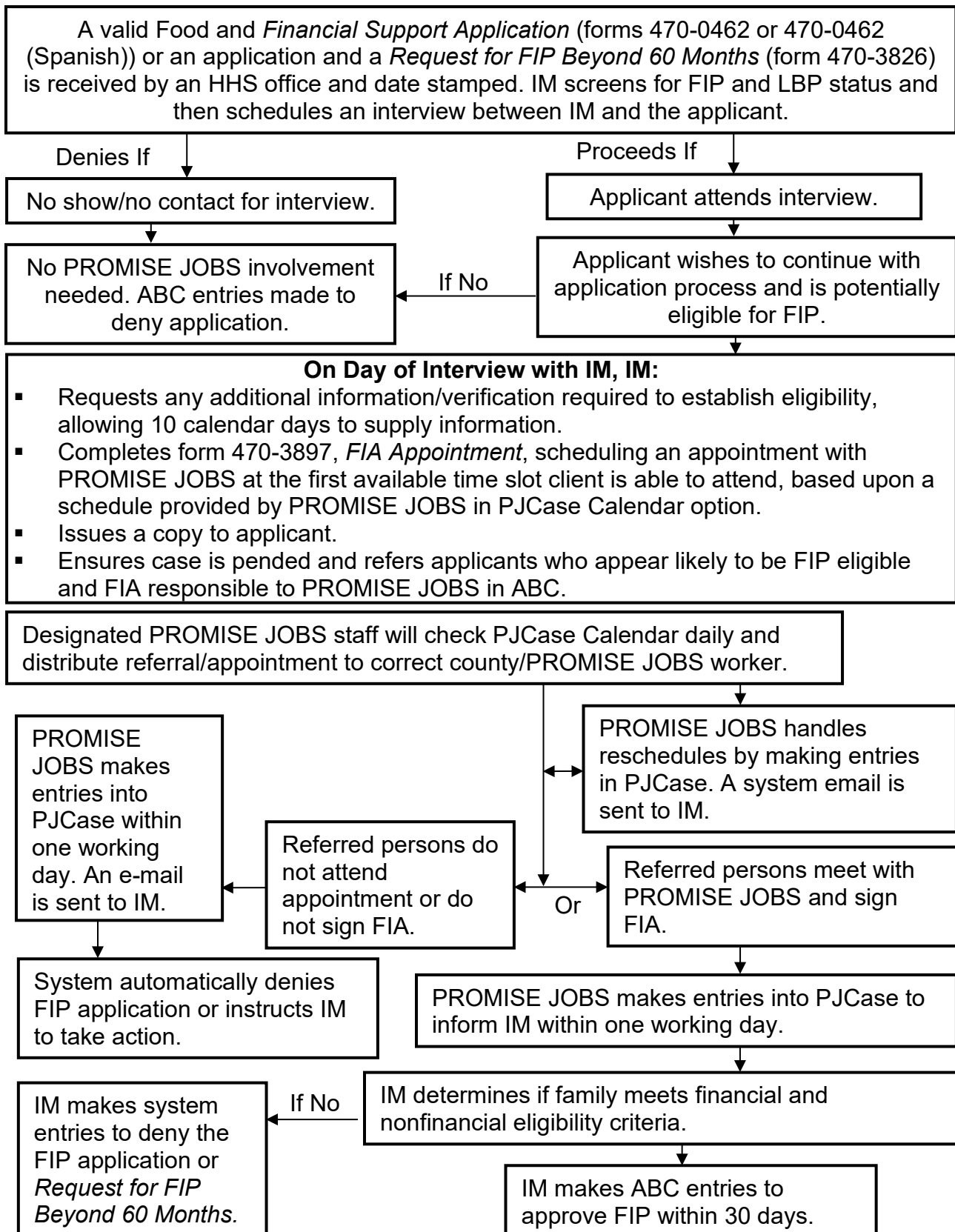
- Denies the application in ABC and sends a *Notice of Decision* to the family when the person is a FIP parent. Otherwise, the IM worker must make entry in ABC to deny the FIP application and to send the notice.
- Sends an email to the IM worker. The email tells the IM worker if the system denied the application, or if the IM worker needs to make entry in ABC to deny the application.
- Changes the person's "applicant" JOBS code to the "unknown" code.

If the applicant contacts you before the end of the workday that you make the PJCase entries, reschedule the FIA appointment. Make every effort to reschedule the appointment within ten calendar days from the date of the IM referral. Make entries in PJCase to refresh your previous entry that an FIA was not signed. The PJCase entry sends an email to the IM worker alerting the IM worker that the appointment has been rescheduled.

See [14-O, Pre-FIP Entries: Applicant Did Not Choose LBP](#) for PJCase entry instructions when the applicant is not in an LBP, or [14-O, Pre-FIP Entries: Applicant Chose LBP](#) when the applicant is in an active LBP.

The following flow chart illustrates the Pre-FIP procedures from referral through approval or denial of the FIP application:

Pre-FIP FIA Process



Break in Assistance of One Month or Less

FIP applicants who have previously signed an FIA and are referred to PROMISE JOBS after experiencing a break in FIP assistance of one month or less may not need to attend orientation and an FIA appointment or sign a new FIA. See [FIA and a Break in FIP Assistance](#) for further information on how to deal with applicants in this situation.

FIP Participants Whose Referral Status Changes to FIA-Responsible

Legal reference: 441 IAC 41.24(239B) and 93.3(239B)

Policy: FIP participants who are being referred to PROMISE JOBS due to a change in their referral status from exempt to FIA-responsible must contact PROMISE JOBS within 10 calendar days after the date of referral to schedule an appointment with PROMISE JOBS to write and sign an FIA to continue receiving FIP.

Procedure: Upon receipt of the referral of an FIA-responsible participant, follow your local procedures to keep track of the 10-day period and whether the participant makes contact.

If the participant contacts PROMISE JOBS, schedule an appointment within 10 days of the date of the contact. During the appointment, complete an orientation, initial assessment, and obtain a completed and signed FIA. Proceed with case management of the FIA.

See [Family Investment Agreement](#) for guidance on the content of the FIA. For participants aged 19 and younger, also see [FIA Options for Customers Aged 19 and Younger](#).

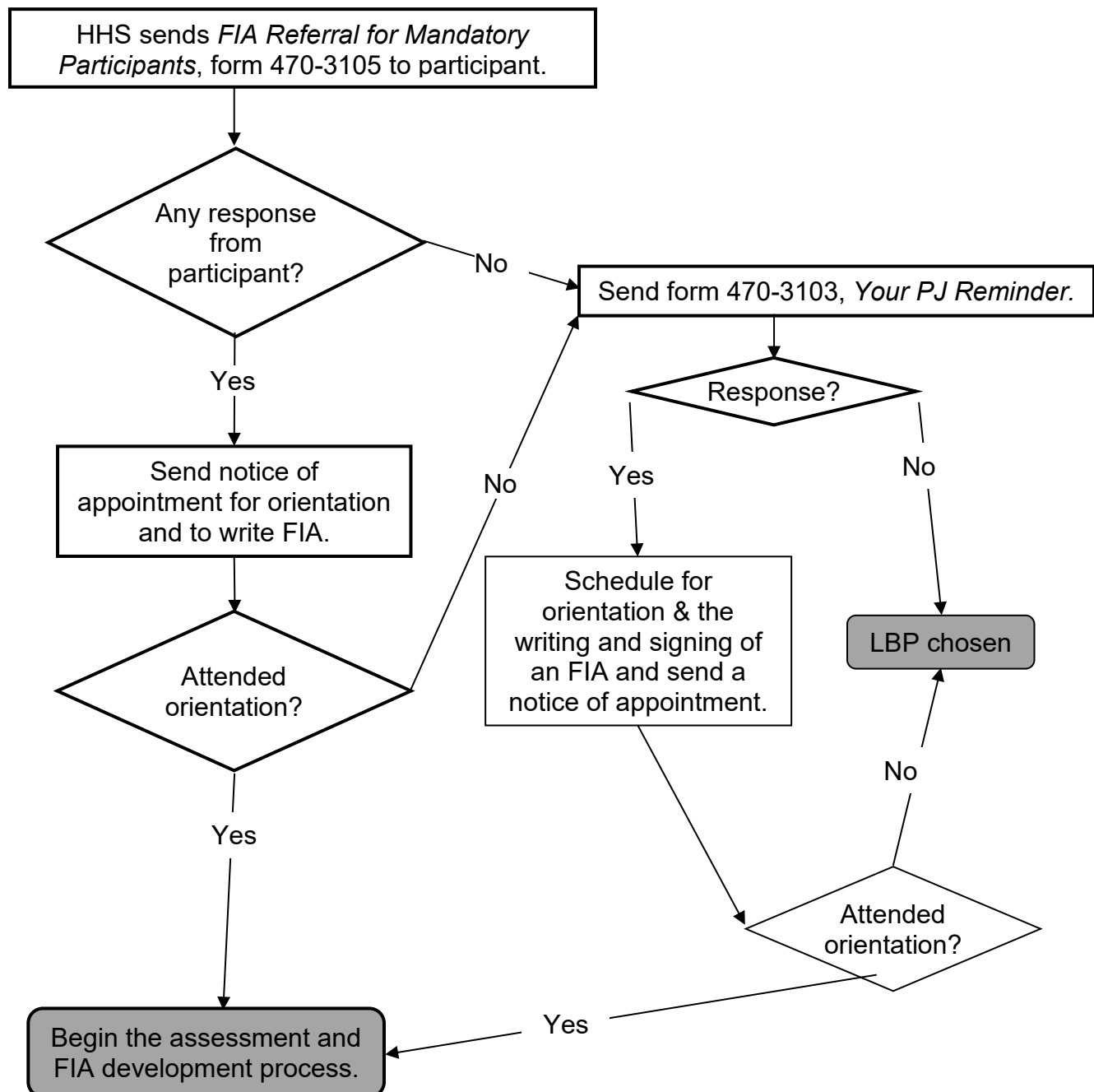
For FIA participants who do not schedule an appointment within the 10 days, send *Your PROMISE JOBS Reminder*, form 470-3103. This form:

- Informs FIP participants who are not following through with orientation and writing and signing an FIA of the consequences of a first and subsequent LBP.
- Tells the participant to contact PROMISE JOBS if the participant has problems that make it difficult to work with PROMISE JOBS.
- Explains that the PROMISE JOBS supervisor is available to discuss any problems or questions.

The flow chart on the next page illustrates the procedure to follow when a participant's PROMISE JOBS referral status code is changed from exempt to FIA-responsible for PROMISE JOBS services.

When you have determined that the participant has chosen an LBP, refer to [Attempting to Resolve Participation Issues](#) on actions you must take in this situation. If the issue is not resolved, refer the case for review as described at [Review of Limited Benefit Plan Recommendation](#).

PROMISE JOBS Referral of FIP Participant Whose PROMISE JOBS Referral Status Changes from Exempt to FIA-Responsible



Orientation for PROMISE JOBS and the FIA

Legal reference: 441 IAC 93.3(4)

Policy: Each person referred to PROMISE JOBS shall receive orientation services.

Orientation is an overview of the PROMISE JOBS program and is the first step in the process to develop an FIA. All referred customers must be informed about the PROMISE JOBS services that are available to be part of the FIA and the programs that are available through PROMISE JOBS, HHS, and other agencies.

Orientation must be provided before the FIA is written.

Procedure: PROMISE JOBS staff provide orientation services for every newly referred FIP applicant and participant as described at [Service Upon Referral](#).

Require applicants and participants to register for employment in IowaWORKS, if you deem that it is appropriate. Note that this registration will not be held on file for participants referred for high school completion, high school equivalency, ABE, ESL, or postsecondary training.

Orientation may be provided individually to the referred person or provided to a group of newly referred persons. PROMISE JOBS offices may choose to include a representative from the Family Development and Self-Sufficiency (FaDSS) program or other local resources in the orientation program.

When a phone interview is required to accommodate a family's situation, provide orientation over the phone or use a secure virtual option that does not identify the applicant to other participants. Mail or electronically send orientation materials to the applicant, along with the FIA as described in [FIP Applicants](#).

Do not waive any requirements of orientation.

When providing orientation, include an explanation of:

- An overview of the PROMISE JOBS program.
- The FIA. Make an effort to ensure that participants understand what is expected from them under the FIA and what they can expect from PROMISE JOBS.
- An overview of the FaDSS program.
- The services available under the PROMISE JOBS program:
 - Assessment

- Educational opportunities:
 - High School Completion
 - High School Equivalency
 - Adult Basic Education (ABE)
 - English as a Second Language (ESL)
 - Postsecondary education, including vocational and apprenticeship training
- Job readiness and job search activities:
 - Job readiness skills training
 - Individual and structured job search
 - Mental health, substance abuse, and other rehabilitative treatment.
- Work activities:
 - Monitored employment, including full or part-time, subsidized, and self-employment.
 - Work experience
 - Unpaid community service.
 - On-the-job training opportunities through other agencies
- Parenting skills training
- Family development
- Child care assistance
- Transportation assistance
- Explain the family violence option. Issue brochures or information available through your local domestic violence project.
- Inform of the availability of family planning counseling services in the area and the financial implications of newly born children on the participant's family.
- Review the LBP and clearly explain when and how a participant is considered to be choosing the LBP. Explain the consequences of choosing a **first** and a **subsequent** LBP. Provide the applicant with a copy of Comm. 170, *Understanding the Limited Benefit Plan*.
- The advantages of employment under FIP, including the earned income tax credit (EITC).
- The 60-month limit on FIP assistance.
- The benefits of cooperation with the Child Support Recovery Unit.
- The Child Care Assistance program availability when FIP ends.
- Transitional Medicaid, which may help if FIP is canceled due to employment.

- Review the rights and responsibilities under PROMISE JOBS and the FIA as stated on form 470-3104, *Your FIA Rights and Responsibilities*. Give orientation participants an opportunity to ask any questions or discuss any concerns they have.

At the conclusion of this discussion phase, require each person to sign form 470-3104, *Your FIA Rights and Responsibilities* and ask the referred person to sign the form. The referred person's signature on this form acknowledges that the referred person has received a full explanation of their rights and responsibilities under the PROMISE JOBS and the FIA.

Meet individually with each referred person to complete assessment and develop the FIA. FIA development occurs immediately after the orientation session and during the scheduled appointment time, using the information from form 470-0806, *PROMISE JOBS Stepping Stones to Family Success*.

EXCEPTION: If the customer's case file contains a previously completed *Stepping Stones* and you and the applicant have agreed that an existing FIA can be reinstated, completing an additional *Stepping Stones* is unnecessary.

Discuss with each applicant or family (if appropriate when two parents or children who are FIA-responsible PROMISE JOBS applicants are involved) their current situation to determine readiness to participate, establish expenses and a payment schedule, and discuss child care needs.

Document clearly when orientation services are provided and the FIA is completed.

See [Beginning PROMISE JOBS Participation](#), [Initial Assessment](#), and [Family Investment Agreement](#) for more information.

Arranging for Services

Legal reference: 441 IAC 93.11(239B)

Policy: PROMISE JOBS case managers are responsible for providing or helping applicants and participants arrange for employment-oriented services that are needed to support the referred person's successful participation in FIA activities. This includes persons wanting to reconsider an LBP. These services include:

- Assessment.
- Case management.
- Transportation.
- Child care.
- Referral for medical examination.
- Supportive services under FaDSS or family development available through other sources.

Procedure: Provide or arrange for services needed to ensure that participants can successfully carry out the activities of the FIA. Needs may be determined or revealed during:

- Assessment,
- Development of the FIA,
- Development of the six-month hardship exemption FIA, or
- Participation in FIA activities.

Participation in PROMISE JOBS is intended to support the family's plan for achieving self-sufficiency. Failure to ensure that service needs have been met can result in undue hardship for the participant and may result in participant failure.

Direct your efforts towards the achievement of the family's goals (entry to employment, overcoming barriers, etc.). Goals can be met only through successful participation by participants.

Self-Initiated Training

Legal reference: 441 IAC 93.6(239B)

Policy: Referred persons in self-initiated postsecondary training may use the training as their FIA activity when:

- An educational evaluation demonstrates the participant is likely to succeed in the training program and,
- The training program meets all the criteria for approvable training as described at [Postsecondary Education and Training](#).

Procedure: Consider a referred person's postsecondary training to be self-initiated when the participant **attended at least one day** of training before participating in PROMISE JOBS orientation.

When participants are in self-initiated postsecondary training at the time of PROMISE JOBS orientation, write the FIA to include an educational evaluation. Request any information needed to determine if the training meets the criteria for approvable training.

Use the results of the educational evaluation and the participant's current educational level to determine the participant's likelihood of success in the training and whether the participant can use the training as an FIA activity.

Consult with your team lead, supervisor, or IWD QA staff to help you arrive at a decision to approve or deny a request for postsecondary training based on the results of the assessment process.

Thoroughly document the basis for your decision in the case record by specifying:

- Any formal assessments that were given and the results,
- Any other information that was considered,
- How you used the evaluation information to either approve or deny the participant's request to include education in the FIA,
- And the decision to approve or deny.

Determine whether the training program meets all criteria for approvable training as described at [Postsecondary Education and Training](#). This includes those in government-sponsored training programs.

Renegotiate the FIA to include the training as an FIA activity when:

- The participant's educational evaluation demonstrates the participant is likely to succeed in the training program and,
- The training program meets all the criteria for approvable training as described at [Postsecondary Education and Training](#).

Participants enrolled in approvable self-initiated training:

- Are eligible for child care and transportation financial assistance when other requirements for the assistance are met.
- Are eligible for financial assistance to cover tuition, fees, books, or supplies when other requirements for the assistance are met.
- When the self-initiated training is **not** approvable, work with the participant to determine other FIA options. Schedule activities that can occur outside of the training schedule when possible.

Participants in nonapprovable training are not eligible for any PROMISE JOBS support payments for training expenses, including child care and transportation.

If the participant's request for training is approved, include the request in the FIA. If the participant's request is denied, issue form 470-0602, *Notice of Decision: Services* as described in [Written Notice to Participant](#).

Beginning PROMISE JOBS Participation

Legal reference: 441 IAC 93.4(239B)

Policy: A person is a “PROMISE JOBS” participant and is eligible for supportive services when:

- The person has signed an FIA and is receiving FIP, or,
- The applicant has signed an FIA and needs to participate in PROMISE JOBS activities to end a subsequent LBP.

Procedure: Consider that a person has become a PROMISE JOBS participant when that person:

- Has a valid FIA and is receiving FIP; or
- Is reconsidering the choice of a subsequent LBP.

Consider this when establishing the start date of the first interim goal and action step of the referred person’s FIA. Also consider the time required to issue any allowable transportation supportive payments. Refer to [FIA Options](#) for more information.

Assessment

Legal reference: 441 IAC 93.5(239B)

Policy: The purpose of assessment is to evaluate the referred person’s employability and educational potential and to determine the services and supports that are needed for the family to achieve self-sufficiency. This information is compiled and used as a basis to:

- Help the referred person make well-informed choices when determining their FIA activities and their steps to self-sufficiency.
- Help the PROMISE JOBS worker to provide appropriate guidance and support.

An educational evaluation is required for referred persons who want to include postsecondary education in their FIA to determine the likelihood of success.

Procedure: Provide an initial assessment at the time of initial referral of a FIP applicant after the applicant has received orientation and prior to writing the FIA with the applicant.

Provide additional assessment as needed after the FIA is written any time further information is needed to help the participant and PROMISE JOBS to determine appropriate FIA activities.

PROMISE JOBS may require a referred person to complete a medical examination from a medical or mental health professional before including a particular PROMISE JOBS activity in the FIA. Use the information provided by the medical or mental health professional to assess the person’s ability to participate in FIA activities.

At any time during the assessment process or as more information is revealed, PROMISE JOBS may refer a person to a medical or mental health professional for an assessment of physical health, mental health, substance abuse, or other rehabilitative services.

Provide a postsecondary education evaluation of the referred person to determine the person's likelihood of success prior to including postsecondary education activities in the FIA.

The following sections give more information on the different levels of assessment:

- [Initial Assessment](#)
- [Additional Assessment](#)
- [Rehabilitation Assessments, Medical Examinations, and Documentation](#)
- [Educational Evaluation](#)
- [Supplementing or Substituting Assessment](#)
- [Supportive Payments for Assessment](#)
- [Documenting Hours of Participation in Assessment](#)
- [Failure to Participate in Assessment](#)
- [Family Violence Referral](#)

Initial Assessment

Legal reference: 441 IAC 93.5(1)

Policy: All persons referred to PROMISE JOBS must participate in an initial assessment which is used to develop the initial FIA. If additional assessment is needed, the additional assessment is written as an activity in the FIA.

All newly referred persons must register for employment with IWD when PROMISE JOBS determines through assessment that registration is appropriate.

An applicant's failure to participate in assessment during the initial FIA appointment results in denial of the FIP application. Follow the procedures described at [Service Upon Referral, FIP Applicants](#).

Procedure: Provide an initial assessment during the FIA appointment for all newly referred FIP applicants and participants whose referral status changes from exempt to FIA-responsible. Meet individually with the referred applicant or participant after the orientation when the person wants to continue in the FIA process. Use form 470-0806, *PROMISE JOBS Stepping Stones to Family Success*, during the initial assessment to develop the FIA in collaboration with the family.

EXCEPTION: Completion of a new Stepping Stones form is not necessary when the referred person's case file contains a previously completed form and you and the person agree that circumstances have not changed and an existing **FIA** can be reinstated. If meeting with the person by phone or virtually, review the fields on the fillable Stepping Stones form with the customer and enter their responses into the fields on the form. For the "Your Signature" field, type your name and "completed verbally over the phone with customer's name" (i.e. "John Worker completed verbally over the phone with Jane Doe"). Enter the date the form was completed in the "Date" field.

For confidentiality and security reasons, do not email the Stepping Stones tool to a customer to be completed and returned to you electronically. Do not ask a customer to email the completed form to you.

At a minimum, review and evaluate, the following family circumstances:

- Family profile and goals
- Work history and employment goals
- Educational background and goals
- Financial situation
- Transportation use and need
- Child care use and need
- Housing situation
- Health issues and health care needs
- Legal concerns
- Assistance received, or needed, from other support agencies
- Discuss family size and wishes regarding referral to family planning counseling in the area
- Potential barriers to attaining the family's goals which may require referral to organizations other than PROMISE JOBS for services

Use the information gathered from review of the Stepping Stones tool and discussion with the referred person as a basis to identify:

- The person's goals for their family and the person's readiness to meet these goals,
- Any needed supports,
- Any barriers to meeting the goals, and
- The appropriate activities to be included in the FIA.

Document in the case file any circumstances or observations used as a basis for decisions that are not illustrated on the Stepping Stones tool or in the FIA. Document any situation or issue identified during assessment that could interfere with the person's participation in PROMISE JOBS activities.

Complete an initial assessment for each FIA-responsible person in the family prior to developing the FIA.

If you determine during the initial assessment that the referred person needs additional assessment, include the additional assessment as an action step in the FIA. Write the FIA without the additional assessment information to allow IM to make the FIP decision. Include the additional assessment as the first step in the FIA. See [Additional Assessment](#) for more information.

If during the initial assessment, you determine that the referred person is receiving supports or services from another agency, you may supplement or substitute your assessment information with comparable assessment information from the other agency with the permission of the referred person. Write the initial FIA without the assessment information to allow IM to make the FIP decision. Request in writing that the referred person provide the additional assessment information to you or ask the person to sign a release to allow you to obtain the information from the other agency. When the referred person will provide the additional information, include providing the information as the first step in the FIA. See [Supplementing or Substituting Assessment](#) for more information. See [Confidentiality](#) for information on obtaining a release.

Proceed to develop the FIA based on the results of the initial assessment. See [Family Investment Agreement](#) for information on developing the FIA.

Register the FIA-responsible person with IWD as a job seeker when you determine through assessment that employment registration is appropriate.

Additional Assessment

Legal reference: 441 IAC 93.5(2); 93.5(3)

Policy: PROMISE JOBS may determine a need for additional assessment during the initial assessment or at any point in the FIA process as the referred person is working towards their FIA goals. Additional assessment may be needed when a participant experiences a change in circumstances that will require the FIA and/or the FIA steps to be amended to accommodate the new circumstances.

Additional assessments may include, but are not limited to, literacy and aptitude testing, education level and basic skills assessment, evaluation of job interests or skills, and occupation-specific assessment or testing.

The participant is responsible for providing any information requested by PROMISE JOBS that is needed to complete the assessment.

PROMISE JOBS may also request medical examinations and rehabilitative assessments to help determine possible needed accommodations.

A new assessment or a previously completed assessment may be used as a tool to determine appropriate FIA activities.

Completion of the additional assessment needs to be specified as a step in the FIA when:

- The assessment is mutually agreed upon between the PROMISE JOBS worker and the referred person as needed to help determine appropriate FIA activities and level of involvement in activities, or
- The assessment is required to determine the likelihood of success in postsecondary education as described at [Postsecondary Education and Training](#).

Procedure: When you determine a need for additional assessment to determine appropriate FIA activities, and the referred person agrees to attend the additional assessment, renegotiate the FIA to include the completion of the additional assessments. If you need the participant to provide any information to allow you to complete the assessment, include the requirement in the FIA. Allow the person at least 10 calendar days to provide the information.

You may also schedule a new assessment at any time during the person's participation in PROMISE JOBS such as when new information is revealed or when a participant is ready to advance to another activity after having completed an FIA activity or service.

You may request that a new *PROMISE JOBS Stepping Stones to Family Success*, form 470-0806, be completed or you may use a previously completed Stepping Stones form if the information is current and applicable. If the referred person's mental and physical status and life situation has not changed significantly, assessment information completed in the past two years may be used instead of performing a new assessment.

Comments:

1. Mr. F has had little work experience and has no specific occupational goals or interests. You include completion of an occupational interest inventory through the local community college in his FIA.

2. During the initial assessment, you find out that Ms. M is working with Iowa Vocational Rehabilitative Services (IVRS). She authorizes you to speak to her IVRS worker during the initial assessment and IVRS faxes a copy of IVRS' current work evaluation to you. You and she use this evaluation to help develop her FIA activities.
3. Ms. T has been a PROMISE JOBS participant for 8 months. During an FIA review she states that her arthritis has gotten so bad that she is having difficulty maintaining her work schedule. She has not been to see her doctor in several years. You request that she receive a medical examination to determine Ms. T's current health status and to provide a completed Form 470-0447, Report on Incapacity, to determine if there is a need for an adjustment to the type of or level of activity in her FIA.

Rehabilitation Assessments, Medical Examinations, and Documentation

Legal reference: 441 IAC 93.5(2) and 93.10(3)

Policy: PROMISE JOBS may require a referred person to obtain a professional rehabilitation assessment of physical health, mental health, substance abuse, or other rehabilitative needs.

PROMISE JOBS may also require a referred person to complete a medical examination before including a particular activity in the FIA when the person specifies or exhibits any condition that might jeopardize successful participation in the activity.

When a referred person claims a physical or mental disability, temporary or permanent, makes PROMISE JOBS participation limited or impossible, PROMISE JOBS may require the referred person to provide documentation from a qualified medical or mental health professional to support their claim.

When documentation of a claimed disability or a medical examination or rehabilitation is needed, the request for the documentation or examination must be in writing as described at [Written Notice to Participant](#).

Procedure: You may require a participant to obtain a professional rehabilitation assessment of physical health, mental health, substance abuse, or other rehabilitative needs is necessary to determine appropriate FIA activities. Request the need for the assessment in writing.

You may require a participant to obtain a medical examination before including a particular PROMISE JOBS activity in the FIA when the participant specifies or exhibits any physical conditions that might jeopardize successful participation. When you determine that a medical examination is needed, request the need for a medical examination in writing.

The qualified medical, substance abuse, or mental health professional should indicate within their knowledge whether the person is capable of completing the FIA activity or continuing with appropriate employment.

Request necessary documentation of a claimed disability in writing. Use form 470-0447, *Report on Incapacity*, or other statement signed by a qualified medical or mental health professional to verify the existence of a disability or limitation.

When you need to assist the participant in obtaining medical verification, ask the participant to sign the *Report on Incapacity*, form 470-0447, to authorize the release of confidential information and contact the medical or mental health professional to obtain the needed information.

Do not delay the writing and signing of an applicant's FIA when documentation is needed for a physical or mental disability, or a medical examination or rehabilitation assessment is needed. Write the need for the written documentation, medical examination, or rehabilitation assessment into the FIA along with the due date.

When documentation is needed for a physical or mental disability, a medical examination, or rehabilitation assessment, allow the participant ten calendar days to provide the documentation or to obtain the examination or assessment. Allow additional time when you see the need or when the participant requests additional time. The participant may not be able to get an appointment for a medical examination or rehabilitation assessment or be able to provide the documentation within ten calendar days.

Do not impose an LBP for failure to:

- Provide a completed *Report on Incapacity*, form 470-0447, or other documentation to support a claimed disability or limitation.
- Obtain a medical examination or rehabilitation assessment or to provide documentation of the results of the examination or assessment.

See [Required Verification and Documentation](#) and [Written Notice to Participant](#) for more information. See [Mental Health, Substance Abuse, and Other Rehabilitative Treatment](#) for more information on requiring a rehabilitation assessment.

Educational Evaluation

Legal reference: 441 IAC 93.5(3)

Policy: Participants who wish to include education in their FIA must participate in an educational evaluation to determine the likelihood of success at completing the training plan.

The participant must provide any information needed to complete the evaluation and participate in an assessment activity when necessary to allow PROMISE JOBS to determine the likelihood of success.

EXCEPTION: A participant under the age of 19 does not need to complete an educational evaluation in order to include high school completion or the equivalent in their FIA.

Procedure: When a participant requests to use education as their FIA activity, complete an educational evaluation to determine if the person is likely to succeed at completing the education before the training plan can be included in their FIA.

If PROMISE JOBS needs the referred person to provide any information or participate in an assessment activity, the requirement needs to be included in the FIA. Include the requirement as the first step in the FIA when the referred person requests to use education as their FIA activity during their initial assessment prior to developing the FIA. When a participant with an existing FIA requests to use education as their FIA activity, schedule an appointment to renegotiate the FIA to include requirements that the participant must meet during the assessment process.

The educational evaluation may include a standardized educational or vocational assessment, but such assessment is not required. The following table shows examples of the types of information that you can use to help determine the participant's likelihood of success at completion of a training plan.

Type of Education Requested	Types of information used in educational evaluation
Education resulting in a vocational certificate or certificate of completion. EXAMPLES: <ul style="list-style-type: none">▪ Nurse aid certification▪ Commercial driver's license▪ Information technology▪ Health care services▪ Child care services	<ul style="list-style-type: none">▪ Review of information from past training situations▪ Past job performance in comparable positions▪ Basic skills test▪ Career-specific assessment▪ Specific standardized test▪ Key historical information

Type of Education Requested	Types of information used in educational evaluation
Education resulting in an associate or baccalaureate degree	<ul style="list-style-type: none"> Standardized assessments in reading comprehension, math, and writing skills, such as GATB (General Aptitude Test Battery), Kuder Skills Assessment, or CASA (Comprehensive Adult Student Assessment) Occupation-specific skills assessments Interest inventories Current or past grades Key historical information

Assessment services may be provided by PROMISE JOBS staff or other entities, as arranged locally. There are no funds for supportive payments to cover the cost of assessment services provided by entities other than PROMISE JOBS.

When key historical information, such as a review of the job history or past training outcomes, relays a clear picture of the participant's skills and ability, a standardized assessment may not be needed.

For example: If a participant is currently enrolled in or has been enrolled in comparable educational program in the past two years, the evaluation may consist of a review of the participant's performance, including grades received.

When using historical information as an indicator of future success, changes in the participant's mental status, physical status, life circumstance, and motivation should be taken into consideration.

Consult with other PROMISE JOBS workers or supervisors to help you arrive at a decision to approve or deny a request to include a training plan in the FIA.

Thoroughly document the basis for your decision in the case file by specifying:

- Any standardized assessments that were completed and a summary of the results,
- Any other information that was reviewed and considered,
- How you used the evaluation information to make your decision to either approve or deny the inclusion of the training plan in the participant's FIA,

- Whether the request is approved or denied, and
- If approved, add the training plan to the participant's FIA as described at [Renegotiation and Amendment of the FIA](#). If not approved, issue a Notice of Decision to deny the inclusion of the training plan in the participant's FIA as per [Written Notice to Participant](#).

Supplementing or Substituting Assessment

Legal reference: 441 IAC 93.5(4)

Policy: FIA-responsible persons may already be participating in self-sufficiency programs with other entities, or they may have recently been involved with a program that has recorded assessment results for the family.

PROMISE JOBS may use assessment information completed with another agency or persons within the past two years instead of completing a new assessment or to supplement a new assessment when all of the following apply:

- The information gathered during the other agency's assessment is comparable to the information that would have been gathered by PROMISE JOBS during the assessment.
- The referred person's mental status, physical status, or life situation have not changed significantly since the other agency's assessment was completed.
- The referred person has given PROMISE JOBS permission to use the other agency's assessment information by signing form 470-0429, *Consent to Obtain and Release Information*, when required.

PROMISE JOBS may use key historical information, such as a review of the referred person's job history or past training outcomes, when the information relays a clear picture of the referred person's skills and abilities, instead of requiring a standardized educational assessment.

Procedure: Using comparable assessments:

You may find comparable assessments with agencies such as Iowa Vocational Rehabilitation Services (IVRS), Head Start, public housing authorities, child welfare workers in public or private agencies, an educational institution or testing service, or family development services. The referred person may also have a case plan or self-sufficiency plan with the other agency.

It is important to the referred person and to the PROMISE JOBS program to ensure that there is no conflict between the FIA and other case plans. On the other hand, it is important that those referred to PROMISE JOBS not feel coerced to provide information held by another agency or person.

When you become aware that a referred person has completed an assessment with another agency, ask the person if they wish to authorize an exchange of information between PROMISE JOBS workers and the workers who have developed the other assessment in question. Be sure the referred person knows that there is no requirement to provide this authorization. However, be sure it is understood that it may be necessary to verify information about another case plan if conflicts develop with the FIA.

Complete form 470-0429, *Consent to Obtain and Release Information*, to authorize collection of the information. This may be completed in conjunction with the permission that the referred person gives to obtain case plan information, etc., as described at [FIA Contents: Including Other Self-Sufficiency Plans Into the FIA](#).

Do not delay development of the FIA of an applicant while awaiting assessment information from another agency when the information cannot be obtained from the agency immediately via phone, fax, or other means during the FIA appointment. In this situation, complete assessment as described at [Initial Assessment](#) and use the information to complete the initial FIA. Review the assessment information provided by the other agency upon receipt. Schedule an appointment to renegotiate the FIA when the new assessment information reveals the need for this.

Using key historical information:

If a referred person is currently enrolled in or has been enrolled in comparable training or an academic program in the past two years, you may use the referred person's performance, including grades received, instead of a standardized educational assessment.

When using historical information as an indicator of future success, consider changes in the referred person's mental status, physical status, life circumstances, and motivation to determine if it is appropriate to use the historical information.

Supportive Payments for Assessments

Legal reference: 441 IAC 93.5(8)

Policy: Persons participating in assessment options are eligible for payment for the cost of transportation and child care needed to attend the scheduled assessment. **EXCEPTION:** Do not issue payment for transportation and child care costs for assessment activities that occur on the same day as orientation.

There are no funds for supportive payments to cover the cost of assessment services provided by entities other than PROMISE JOBS.

Procedure: Discuss transportation and child care needs with newly referred persons during initial assessment and document the person's needs in the case record.

When scheduling a participant for an assessment activity that is included in the FIA and the participant needs transportation to participate in the activity, contact the participant to determine the amount of need when documentation is not available in the case record. Issue payment to the participant for the cost of transportation as described at [Supportive Payments: Transportation](#). Use the PJCase system to issue the transportation payment.

Exception: Contact IWD QA staff for instructions on how to proceed when a participant is not in PJCase due to not having an SSN.

Determine eligibility for child care assistance (CCA) as described at [Supportive Payments: Child Care Assistance \(CCA\)](#), and [13-G](#) when the participant needs CCA to participate in an assessment activity.

You may authorize payment in the PJCase system for the costs of obtaining a birth certificate when:

- The birth certificate is needed in order for the referred person to complete the IWD registration process described at [Initial Assessment](#), or
- Translation of a foreign birth certificate is needed to complete work registration.

Persons who miss any portion of scheduled assessment services may be required to make up the missed portions of the sessions, based on worker judgment and participant needs. When make-up sessions are required, do not give the participant an additional transportation supportive payment, but pay for necessary child care.

Documenting Hours of Participation in Assessment

Legal reference: 441 IAC 93.5(7)

Policy: Actual hours of participation in assessment activities must be verified and documented in the case record.

The participant is responsible for providing documentation of actual hours of participation in assessment when the assessment activity is not administered and supervised by PROMISE JOBS.

Procedure: For an assessment activity that is administered and supervised by a PROMISE JOBS worker, the worker will document actual hours that the participant spent participating in the activity in the case record.

For an assessment activity that is administered and supervised by an entity other than PROMISE JOBS, the other entity is responsible for documenting and verifying the participant's actual hours of participation in writing.

Require the participant to provide written documentation to verify actual hours of participation in assessment activities not administered and supervised by PROMISE JOBS.

When actual hours of participation are verified, enter actual hours of participation in the IowaWORKS system.

See [Required Verification and Documentation](#) for more information.

Failure to Participate in Assessment Activities

Legal reference: 441 IAC 93.5(9)

Policy: When an assessment activity is written in the FIA, participants who do not appear for or complete a scheduled assessment or who do not provide assessment information after PROMISE JOBS provides one written reminder are considered to have chosen a limited benefit plan (LBP) unless the participant has good cause for the failure.

Procedure: Consider that a participant has chosen an LBP when the FIA includes an assessment activity and the participant does not appear for or complete a scheduled assessment or does not provide assessment information after PROMISE JOBS provides one written reminder unless the participant has good cause.

Follow the policies and procedures described at [Written Notice to Participant](#), [FIA Participation Issues](#), and [Limited Benefit Plan \(LBP\)](#).

Domestic Violence Referral

Policy: PROMISE JOBS must screen applicants and participants for the existence of domestic violence and the need for appropriate referrals and for a communication plan as described at [Family Violence Option](#).

Procedure: To be prepared to make domestic violence referrals:

- Have the local domestic violence provider contact information available. Find more information about local programs at: <https://www.icadv.org/iowa-victim-service-programs> Have information about local domestic violence services available.
- Post information about domestic violence throughout the office and have information readily available for all referred persons. Providing the survivor with information and the opportunity to make their own decisions is the best method of intervention. Always treat the person non-judgmentally and with respect.
- Do not call law enforcement unless the survivor specifically asks you to, or the perpetrator is on the scene and behaving in a threatening manner.

Because of privacy and safety issues, your documentation should not include details of abuse. The information the participant discusses with the domestic violence hotline is privileged and must remain so. Document only that the domestic violence protocol was followed.

Allow a survivor the option of choosing to include the family violence option in their FIA. See [Family Violence Option](#).

Family Investment Agreement (FIA)

Legal reference: 441 IAC 93.4(239B); 41.24(239B)

Policy: Any person referred to PROMISE JOBS must sign and carry out the activities of an FIA as a condition of receiving FIP and PROMISE JOBS services.

The FIA is the individual family's plan to becoming self-supporting. The FIA is intended to address the goals of the family and to identify the needs and problems that must be met and solved so that the family can achieve their goals. The FIA details:

- The family's interim goals and the activities that the FIA-responsible family members will participate in and the actions they will take to reach their long-term goals and eventual self-sufficiency,
- The expectations of both the PROMISE JOBS program and the family in accomplishing the FIA goals, and
- The supports and services that will be provided by PROMISE JOBS.

Applicant families who choose not to enter into the FIA shall have their application for FIP denied. Those who choose not to continue FIA activities after signing the FIA and those who lose exempt status and fail to write and sign an FIA shall enter into an LBP, as described at [Limited Benefit Plan \(LBP\)](#).

FIA requirements are flexible to accommodate different individual circumstances. FIA-responsible persons who have the potential to move into self-sufficiency with short-term assistance can do that without being required to participate in activities that do not meet their needs. FIA-responsible persons who require extensive long-term agreements will receive appropriate assistance without facing an arbitrary cutoff date other than the 60-month lifetime limit of receiving FIP benefits. For persons and families with acknowledged barriers, one or more incremental FIAs may be written.

Although there is no standard length for an FIA, the ending date cannot exceed the family's 60-month lifetime FIP limit unless an extension due to a hardship has been granted.

Procedure: A family's understanding of the full range of programs and resources that are available in the PROMISE JOBS program is basic to the family's success in the FIA. PROMISE JOBS staff provide this information during the orientation process as described at [Orientation for PROMISE JOBS](#).

Provide the FIA development and monitoring services as described in the following sections. Develop close coordination with public and private agencies and entities that can contribute to the success of a family and their FIA.

This section provides the policies and procedures surrounding the development and the content of the FIA. See [Referring Persons to PROMISE JOBS](#) for more information who is FIA-responsible and procedures for referral. See [Service Upon Referral](#), [Orientation](#), and [Initial Assessment](#) in this chapter for more information on the policies and procedures that apply during the FIA appointment before the FIA is written.

Information about the FIA is organized into the following sections:

- [FIA-Responsible Persons](#)
- [FIA Requirements](#)
- [FIA Options](#)
- [FIA Contents](#)
- [Renegotiating and amending the FIA](#)
- [FIA Progress Review](#)
- [FIA and Grace Period Following Denial of a FIP Application](#)
- [FIA and a Break in FIP Assistance](#)
- [FIA and FIP Reinstatement](#)

FIA-Responsible Persons

Legal reference: 441 IAC 93.4(2); 41.24(239B)

Policy: Unless exempt from PROMISE JOBS, the following persons are responsible for signing and carrying out the activities of the FIA:

- All parents
- A child aged 16 or older, including a minor parent
- Any other adult whose needs are included in the FIP grant

The FIA consists of the following two forms:

- Family Investment Agreement, form 470-3095, and
- FIA Steps to Achieve Self-Sufficiency, form 470-3096

Procedure: When the FIP eligible group includes a parent(s) or needy relative and a child who is not a parent and all are FIA-responsible, all must sign form 470-3095 and each must sign form 470-3096 as a condition of FIP eligibility. All must carry out the activities of the FIA and their steps to continue receiving FIP. Copies of the FIA shall be placed in individual case files.

When the FIP eligible group includes a minor parent living with a parent or needy relative who receives FIP, and both are FIA-responsible, the parent or needy relative and minor parent are each responsible for a separate FIA as a condition of FIP eligibility. Since each is responsible for self-sufficiency for that parent's family:

- The parent or needy relative must sign form 470-3095 and form 470-3096 and
- The minor parent must sign their own form 470-3095 and form 470-3096.

This applies even when the minor parent and child are the only children on the FIP grant.

When the FIP eligible group holds a parent(s) or needy relative who is exempt and more than one child who is FIA-responsible, each child is responsible for completing a separate FIA.

FIA Requirements

Legal reference: 441 IAC 93.4(3); 93.4(4)

Policy: It is expected that employment leading to economic self-sufficiency is the eventual goal of the FIA:

- To the maximum extent possible, the FIA needs to reflect the goals of the family, subject to program rules, funding, the capability, experience and aptitude of family members and the potential market for the job skills currently possessed or to be developed.
- The program goal for all FIA-responsible persons is to be involved in PROMISE JOBS activities on a full-time basis unless barriers prohibit this level of involvement. "Full-time" is considered an average of at least 30 hours per week.

In order to support the family efforts toward self-sufficiency, the FIA needs to identify and specify:

- The FIA options that the referred person will participate in and their level of participation.

The individual level of participation in PROMISE JOBS activities, using one or more options, must be full-time or significant so as to move toward this level.

“Full-time” is defined as an average of at least 30 hours per week. Participation at a level that is less than full-time is appropriate when specific family needs, problems, or barriers prevent this level of involvement.

- PROMISE JOBS expectations, including FIA-responsible person’s responsibility to provide verification of hours of participation, the method of verification and the time frames for providing the verification.
- Any identified barriers to participation and a plan to resolve the barrier, appropriate referrals, and supportive services necessary to manage or eliminate the barriers.
- Any needs of the referred person, such as child care or transportation, and the specific supports and services to be provided by PROMISE JOBS.
- The date that the family expects to reach their goals and become self-sufficient and no longer in need of FIP.
- The eventual goal of the FIA which must be employment leading to economic self-sufficiency.
- The referred person’s response to the option of a referral for family planning counseling as described at Family Planning Counseling as an FIA Option.

An FIA-responsible person must have a valid FIA. A valid FIA is current and not past the self-sufficiency date specified on form 470-3095 and is signed by:

- The FIA-responsible person(s)
- The PROMISE JOBS worker
- The PROMISE JOBS supervisor

Do not wait until an FIA expires to renegotiate and amend the agreement. **EXCEPTION:** A FIP recipient who loses exempt status will not possess a valid FIA from the time of referral through:

- The process of writing and signing an FIA; or
- The imposition of an LBP for failure to write and sign an FIA.

Procedure: To meet FIA requirements:

- Develop an FIA during the orientation and the initial assessment process through discussion between the referred person and PROMISE JOBS.
- Use forms 470-3095, Family Investment Agreement and 470-3096, FIA Steps to Achieve Self-Sufficiency.
- See [Six-Month Family Investment Agreement](#) for FIA policies specific to families that have been granted a hardship exemption.

Use the information obtained on form 470-0806, *PROMISE JOBS Stepping Stones to Family Success*, and from discussion that occurred during the assessment process to help the referred person identify:

- The family and referred person's goals for reaching self-sufficiency,
- The specific FIA options and activities, level of participation, and targeted start and completion dates.
- The support and services to be provided by PROMISE JOBS,
- Any identified barriers or problems, and
- The date the family expects to be self-sufficient and no longer eligible for FIP.

Work with all members of the family who must sign the FIA to help them choose their participation in one or more FIA options as described at [FIA Options](#).

If additional assessment is needed, include the assessment as the first activity in the FIA. See [Assessment](#) earlier in this chapter for more information.

Determine the person's level of participation for each of the FIA activities. Expect the person to participate in FIA activities full-time when the person does not have a family need that must be resolved first or does not have any problems or barriers that will prevent full-time involvement. Allow a person to participate at a level that is less than full-time when the person must resolve a family need, such as obtaining child care, or when the person has a problem or barrier that must be resolved.

Consider the level of commitment required for full-time postsecondary education (as defined by the educational institution) as equivalent to the level of commitment required for full-time employment.

When an FIA-responsible person is caring for their own child under 12 weeks of age at the time of referral to PROMISE JOBS, require the person to participate actively in PROMISE JOBS orientation and assessment to the extent that future self-sufficiency activities are clear and the FIA is signed.

The FIA-responsible person may choose to use the policies of the Family Leave Act of 1993 as described at [Problems With Participation](#) as one of the FIA options for up to 12 weeks. Because future activities are already planned, there will be no delay in participation at the end of the period chosen for family leave.

See [Renegotiation and Amendment of the FIA](#) for policies to use when a child is born after the FIA is signed.

EXAMPLES:

1. Ms. A, who has no significant barriers to participation, should be able to use one of the following in her FIA:
 - Full-time job readiness skills training
 - Full-time employment.
 - Full-time individual or structured job search.
 - Full-time classroom training.
 - A combination of activities that will result in participation of an average of at least 30 hours per week. A targeted specific date when monitored employment will lead to self-sufficiency.
2. Ms. B, who has not graduated from high school and has no connection with the workforce and who has been isolated from community interaction, may use the following FIA steps that would be "...significant so as to move toward full-time participation":
 - Use life skills or a few hours per week of unpaid community service as a first step in the FIA.
 - Include specific plans to begin high school equivalency classes within a few months.
 - Specify the date when job readiness skills training or job search activities will begin and monitored employment is expected to lead to self-sufficiency.
3. Ms. C, whose employability potential is very low, may use the following FIA steps that would be "...significant so as to move toward full-time employment":
 - Life skills workshop.
 - Unpaid community service for an appropriate amount of time.
 - FaDSS services if appropriate and available.
 - Specific plans farther in the future for a two-day per week work experience placement combined with one-day per week of job search.
 - Specific date when job readiness skills training or other job search activities are expected to begin and monitored employment is expected to lead to self-sufficiency.

FIA Options

Legal reference: 441 IAC 93.4(4)

Policy: With the assistance of the PROMISE JOBS case manager, FIA-responsible persons need to select the PROMISE JOBS activities that will be included in their FIA and in which they will participate in to obtain the eventual goal of self-sufficiency.

Procedure: You may help FIA-responsible persons choose from the following activities as options of the FIA:

- Assessment
- Job readiness skills training
- Individual and/or structured job search
- Monitored part-time or full-time employment and self-employment
- Work experience placement
- Unpaid community service
- Basic Education: High school completion activities, high school equivalency classes, Adult Basic Education (ABE), English as a Second Language (ESL)
- Approvable postsecondary training
- Family Violence Option
- FaDSS or PROMISE JOBS family development programs
- Treatment plan for self-disclosed substance abuse, mental health, or other rehabilitation treatment.
- Parenting skills training
- Referral for Family Planning Counseling
- Other programs and services offered by IWD or other agencies, such as subsidized employment, on-the-job training, and apprenticeship opportunities.

When writing an FIA, use all other policies in this manual that apply to the FIA options chosen. There is a section within this manual with additional details and requirements regarding each of the above options, except for “Other programs and services offered by IWD or other agencies”. There may be other activities not listed above that may be appropriate as an FIA option, such as activities included in a self-sufficiency plan with another agency. Contact your PROMISE JOBS Coordinator at IWD if you need additional information regarding any programs or services offered by IWD or to determine if other activities may be included in the FIA.

Help referred persons to choose appropriate options that will eventually lead to employment and self-sufficiency. Use the following principles regarding employment in the FIA:

Use employment as the principal activity of the FIA whenever it is possible and assessment demonstrates the referred person is ready for work. Consider the person’s specific family needs, problems, and barriers and whether employment will interfere with other FIA activities, such as approvable training, when making this determination.

When family circumstances do not allow employment as the principal activity, use employment combined with other FIA options to the extent possible based on the circumstances of the family.

Use employment in the FIA when the person is on a waiting list for a PROMISE JOBS activity or supportive service or payment, unless family or other circumstances indicate that employment is not appropriate. See [Waiting Lists](#).

When writing the FIA for a FIP applicant who is approved for Child Care Assistance (CCA) for a three-month period of job search and FIP applicants who have a pending CCA application for job search, use individual job search as the first FIA activity, if the participant chooses job search as their FIA activity. If the FIA will include activities other than job search, do not expect the other activities to begin until after the three month period of job search has ended, unless the participant chooses to combine other activities with their job search. See [Individual Job Search Supportive Payments](#) for more information on CCA eligibility.

Family Planning Counseling Referrals As an FIA Option

Legal reference: 441 IAC 93.9(3)

Policy: Referral for family planning counseling services is an optional service to be offered to each PROMISE JOBS FIA-responsible person. The person's response to the offer of a referral must be recorded on form 470-3096, *FIA Steps to Achieve Self-Sufficiency*.

Family planning counseling services are not an activity that can be used to meet FIA requirements and cannot be the only FIA step.

LBP policies do **not** apply to family planning counseling services. This is true for referred persons who:

- State they do not want family planning counseling services and choose not to include family planning counseling in form 470-3096, *FIA Steps to Achieve Self-Sufficiency*; or
- Do not carry out the family planning counseling step of the FIA.

Procedure: You have the following responsibilities with each FIA-responsible person in the referral for family planning counseling:

- During the initial FIA interview and when renegotiating an FIA, discuss with the referred person, orally and in writing, the financial implications of additional children on the family.

- Provide factual, objective assistance about the basics of family planning. Do not offer personal advice. Be sure the referred person clearly understands that there is no PROMISE JOBS or FIA requirement to accept a referral for family planning counseling services.
- Always remind the referred person that family planning counseling services may be available from doctors, hospitals, or other sources, as well as family planning clinics.
- After this discussion, record the person's response to whether or not they would like information for a referral for family planning counseling on form 470-3096, *FIA Steps to Achieve Self-Sufficiency*.

For those who accept a referral, provide a list of resources for family planning counseling services available in the area of the referred person's residence. Use the list of Title X family planning services available on the HHS website or another listing of resources that is more appropriate to your area.

Include family planning counseling as a step in the FIA if this is what the referred person wants. The referred person is not required to:

- Indicate a specific provider (but may do so).
- Report the actual start and end dates of the counseling services.

Indicate that the referred person has included family planning counseling services as a step in the FIA in IowaWORKS. Enter "0" for hours.

FIA Options for FIA-Responsible Persons Aged 19 and Younger

Legal reference: 441 IAC 93.4(4) and 41.24(3)"a" and "b"

Policy:

FIA-responsible child aged 16 through 18:

An FIA-responsible child who is under age 18 at the time the FIA is written and **not a parent** and who has not completed high school shall be strongly encouraged to participate in educational activities to obtain a high school diploma or the equivalent as their FIA activity. If high school or the equivalent is not included in the FIA, the FIA-responsible person must select other PROMISE JOBS work and training activities.

An 18-year-old FIA-responsible child who is not a parent and who was referred when under the age of 18 for not attending high school or the equivalent and who signed an FIA must be participating in high school completion activities or the equivalent to remain eligible for FIP. See [4-C, Age](#).

FIA-Responsible Parents Aged 18 and younger:

Parents under age 18 are FIA-responsible unless exempt even if:

- Emancipated by court action or marriage or
- Considered a child on the case of the minor parent's parent.

The receipt of SSI and alien status are the only exemption criteria that apply to parents aged 18 and younger.

As part of the FIA, parents who are under age 18 and **not married**, and who have not completed high school must:

- Include attendance in educational activities to obtain a high school diploma or its equivalent in their FIA, except when the school considers the parent unable to participate in educational activities.
- Participate in work and training activities if educational activities to obtain a high school diploma or its equivalent are not included in the FIA.
- Participate in parenting skills training.
- **In addition to the above requirements**, parents under age 18 and not married **must** participate in FaDSS or other family development if they are not living with their parent or legal guardian.

FIA-Responsible Parents Aged 19 and younger:

FIA-responsible parents aged 19 and younger are required to include parenting skills training in the FIA.

A 19-year-old FIA-responsible parent who has not completed high school shall be strongly encouraged to participate in educational activities to obtain a high school diploma or the equivalent as their FIA activity. If high school or the equivalent is not included in the FIA, the parent must select other PROMISE JOBS work and training activities.

Procedure:

High school diploma or the equivalent for persons aged 19 or younger:

Require high school completion or the equivalent for parents under age 18 and who are not married unless the school considers the parent unable to participate in educational activities.

For an FIA-responsible child who is not a parent, strongly encourage the child to participate in educational activities to obtain a high school diploma or the equivalent.

Emphasize that a high school education is recognized as important to achieving self-sufficiency.

- Give the child information regarding the potential earnings of a person with a high school education compared to the earnings of those who do not so that the person is able to make an informed choice.
- If high school attendance or high school equivalency completion is not included in the child's FIA, require the child to select other work and training activities.

FIA-responsible persons who do not attend educational activities to obtain a high school diploma or the equivalent as stated in their FIA are considered to have chosen an LBP unless problems or barriers are preventing their participation. Policies at [Written Notice to Participant](#), [FIA Participation Issues](#), and [Limited Benefit Plan \(LBP\)](#) apply.

See [Basic Education Services](#), [High School Completion and High School Equivalency Diploma](#) for more information.

Family development services for minor parents (under age 18):

Require minor parents who are under age 18 and **not married** to participate in FaDSS or other family development as an FIA activity if they are not living with their parent or legal guardian.

For minor parents, always use FaDSS as the provider of family development services when the FaDSS grantee in your area has slots. Use other family development service providers in your area when FaDSS has no available slots. To determine whether the minor parent is living with their parent or legal guardian, check the parent's "Minor Parent Code" in the FET option in the WISE system. FET will display the "minor" code entered by the IM worker in the ABC system to show the living circumstances of the minor parent.

Minor Code Definition

0	Under 18, has been married
1	Living with self-supporting parents
2	Living with legal guardian
3	Living independently
4	Living in a three-generation FIP household
5	Living with a non-parental caretaker

If you have questions about the circumstances of any parent under age 18, contact the IM worker.

Minor parents with codes of '3' or '5' must participate in FaDSS or other family development services.

Minor parents who do not live with their parent or legal guardian and do not participate in FaDSS or other family development services as stated in their FIA have chosen the LBP unless problems or barriers are preventing their participation. Policies at [Written Notice to Participant](#), [FIA Participation Issues](#), and [Limited Benefit Plan \(LBP\)](#) apply.

Continue participation in FaDSS or other family development services after age 18 only if the participant and the family development provider agree that the services are needed to help the family reach self-sufficiency.

PROMISE JOBS funding is available for other family development services for minor parents, even after they turn 18 while participating in family development.

See [Family Development and Self-Sufficiency Program \(FaDSS\)](#) and [Other Family Development Services](#) for more information.

Parenting Skills Training:

Require FIA-responsible parents aged 19 and younger to include parenting skills training in the FIA. This applies to parents who are age 19 when the FIA is signed.

Young parents who do not participate in parenting skills training when included in their FIA have chosen the LBP unless problems or barriers are preventing their participation. Policies at [Written Notice to Participant](#), [FIA Participation Issues](#), and [Limited Benefit Plan \(LBP\)](#) apply.

See [Parenting Skills Training](#) for more information.

Family Development and Self-Sufficiency Program (FaDSS)

Legal reference: 441 IAC 93.4(4) and 93.9(2)

Policy: The Family Development and Self-Sufficiency (FaDSS) program prioritizes FIP participants who require concentrated services to overcome severe or multiple barriers in order to become self-sufficient. Participation in FaDSS is voluntary.

The program emphasizes the strengths of families while providing ongoing assessment and goal setting and addresses safety, basic needs, shelter, health, and family functioning. FaDSS provides continuing support to these families as they work toward self-sufficiency.

FaDSS services are appropriate when:

- Very frequent contacts of personal support would greatly increase the possibility of self-sufficiency.
- The participant faces significant multiple family barriers and time is needed to address these barriers before beginning progress on economic goals.
- The participant is having difficulty understanding the FIA and the LBP process.

FaDSS is designed to assist a participant with severe or multiple barriers to participate in the PROMISE JOBS program meaningfully. While the FaDSS program prioritizes FIP families, eligibility for the FaDSS program is not contingent on the family receiving FIP. If a family no longer receives PROMISE JOBS services because their FIP ended, FaDSS may continue to provide support to the family while they are engaged in the FaDSS program and determined to meet program eligibility criteria.

Collaboration between PROMISE JOBS and FaDSS grantee staff is required when a family is participating in both programs. When providing services to a family who is enrolled in the FaDSS program, keep in mind that:

- FaDSS and PROMISE JOBS are both essential resources for the FIA. Each depends on the other to provide participant services not provided by the other program.
- PROMISE JOBS and FaDSS will not interrupt each other's services. The FaDSS specialist and the PROMISE JOBS case manager, in consultation, shall decide if and when a FaDSS participant is capable of actively participating in other PROMISE JOBS activities.

Procedure:

Referral by PROMISE JOBS:

PROMISE JOBS may determine that a family would benefit from intensive FaDSS services through initial and ongoing assessment, if a family is having difficulty participating successfully, or if there is a prior history of an LBP.

Offer a referral to FaDSS to families who:

- Are having difficulty understanding the FIA and participating successfully,
- Have a prior history of an LBP,
- Have chosen the family violence option,
- Have a history of domestic violence, or are currently at risk because of domestic violence,

- Have significant multiple family barriers and time is needed to address these barriers before beginning progress on economic goals,
- May benefit from frequent contacts of personal support to help increase the possibility of the family's self-sufficiency.

To make a referral to FaDSS:

- Email the FaDSS provider local to the participant, following current guidance between FaDSS and PJ.
- Attach a copy of the FIA to the referral email.
- Case note the referral.

The FaDSS specialist will notify PROMISE JOBS of the outcome of the referral, whether that be a successful enrollment, placement on a waiting list due to program capacity, the family declining services, or unsuccessful contact. The FaDSS specialists will provide this information within one month from the date of referral. If you have questions, reach out to the specialist directly.

Referral by an agency other than PROMISE JOBS:

FaDSS grantees may obtain referrals from agencies outside of PROMISE JOBS. The FaDSS grantee is responsible for verifying the family's FIP status and that the family meets one or more of the FaDSS at risk and eligibility criteria.

Recruitment by FaDSS:

FaDSS grantees may use the list of FIP participants provided by HHS to recruit potential FaDSS participants.

If the FaDSS referral source is not PROMISE JOBS, within seven days of receiving the referral, FaDSS will notify PROMISE JOBS that FaDSS is recruiting a FIP/PROMISE JOBS family.

Within one month of receiving a referral from a source other than PROMISE JOBS, the FaDSS specialist will:

- If needed, send an email asking PROMISE JOBS to verify the SID, Case #, FIP status, and FIA-responsible individuals.
- Email PROMISE JOBS the outcome of the referral or if the recruitment efforts extend past one month of receipt of the referral. If recruitment efforts extend past the one month time period, FaDSS will notify PROMISE JOBS of the outcome of those efforts when the family enrolls or declines services.

See [FaDSS Participation](#) for policies and procedures regarding families who are considering enrolling into the FaDSS program or who have accepted FaDSS services.

FaDSS Participation

Legal reference: 441 IAC 93.4(4) and 93.9(2)

Participation in the FaDSS program begins when a family that contains a current PROMISE JOBS participant voluntarily agrees to participate in FaDSS services. The FaDSS grantee will inform you of the status of the referral, and the date of enrollment, or that a family has declined FaDSS services as discussed in the prior section. The FaDSS specialist should be present during the FIA development process when possible. This may not be possible for FIP applicants who will sign their FIA before having an opportunity to be referred to FaDSS.

However, it may be possible to include the FaDSS specialist in the FIA appointment when:

- A participant who is referred to FaDSS needs to renegotiate their FIA.
- An applicant was referred to FaDSS prior to losing FIP eligibility and the applicant continued to participate FaDSS.

Send a copy of form 470-0813, *Notice of Appointment or Participation*, to the FaDSS specialist or contact the FaDSS specialist worker by email or phone when scheduling an appointment to meet with the customer.

When the FaDSS specialist cannot attend the appointment due to scheduling conflicts, the FaDSS specialist will contact you to discuss FIA activities for that particular family. Establish a local procedure for communication to ensure an effective flow of services to FaDSS participants.

When an applicant or participant chooses to participate in FaDSS, always include FaDSS in the FIA. For some families, you may determine that it is best that FaDSS participation be the only activity. During a six-month hardship exemption, a “FaDSS only” FIA may be appropriate when you determine that is the most reasonable method to address the hardship barrier.

When the FaDSS participant signs the FIA, give a copy to the participant and to the FaDSS grantee.

Make entries in the IowaWORKS system to report the FIA has been signed. Also make entries to show the FaDSS component code and a start date for the FaDSS service.

The date of enrollment into the FaDSS program is based upon the date that a family is assigned into FaDSS as determined by the FaDSS grantee.

When a participant is also involved in another PROMISE JOBS component, make separate entries to show both the FaDSS and PROMISE JOBS activities.

Do not make monthly entries to show hours of attendance in FaDSS activities. Do not issue a payment for expenses related to the FaDSS supportive services component.

The FaDSS specialist will communicate regularly with the PROMISE JOBS worker regarding the participant using e-mail or phone. All e-mail correspondence must begin with the statement:

“This message contains confidential information. Unauthorized use or disclosure is prohibited.”

FaDSS participation does not remove the participant’s responsibilities to follow the FIA requirements. When a FaDSS participant appears not to be fulfilling FIA obligations, notify the FaDSS specialist and discuss your concerns at the time you send a clear written reminder. FaDSS may be able to help the participant resolve the participation issue.

If the FaDSS specialist indicates that the FIA-responsible person has been demonstrating effort to carry out the steps of the FIA but is unable to participate due to a family barrier, schedule a meeting between PROMISE JOBS, the participant, and the FaDSS specialist to renegotiate and amend the steps of the FIA.

The renegotiated FIA must include steps towards self-sufficiency that the participant is able to fulfill.

FIP/FaDSS participants are subject to an LBP without a FaDSS exit email when they:

- Refuse to amend or renegotiate the FIA;
- Fail to sign an FIA; or
- Fail to follow the terms of the FIA.

Notify the FaDSS specialist within 10 days when a participant has chosen an LBP.

Transition From FaDSS to Other Components

Policy: FaDSS specialists monitor participants whose only activity is FaDSS participation in their FIA to determine if they will be ready for PROMISE JOBS participation by the end of the FaDSS-only period. Schedule an appointment before the end of this period by sending a form 470-0813, *Notice of Appointment or Participation* to the participant with a copy to FaDSS to renegotiate or amend the FIA.

Continue the FaDSS component for minor parents who are not living with a parent or legal guardian when they become 18 **only** when both the participant and the FaDSS specialist believe that the services are needed for the family to reach self-sufficiency.

Assessment results recorded before the participant received FaDSS services may not indicate that person's full potential. If you believe that additional assessment is necessary to reassess the participant's abilities and circumstances, you may require the participant to complete assessment again when the FaDSS specialist approves assignment to other PROMISE JOBS activities.

Procedure: When the participant completes the FaDSS program (as defined by the FaDSS specialist working with the individual and the family), the FaDSS specialist will send an exit email to PROMISE JOBS.

The participant may discontinue participating in the FaDSS program before completing the program. The FaDSS specialist will send an exit email to PROMISE JOBS. Send a notice to the participant to rewrite their FIA to remove FaDSS.

The FaDSS specialist will send an exit email to PROMISE JOBS when:

- The family has decided that they no longer wish to receive FaDSS services.
- The family has completed the FaDSS program.

When a participant leaves FaDSS, make entries in the case notes to show the termination date and reason.

Other Family Development Services

Legal reference: 441 IAC 93.9(2); 93.4(4)

Policy: Family development services may be appropriate as an FIA activity and are defined as follows:

- Family development services are support services for PROMISE JOBS families who may need more support to gain self-sufficiency.
- Family development services are designed to promote, empower, and nurture the family to self-sufficiency and healthy reintegration into the community.
- Family development services are available through the FaDSS program and through other agencies. Family development services through other agencies may be used when the area FaDSS grantee is not accepting new referrals. See [Family Development and Self-Sufficiency Program \(FaDSS\)](#) for more information regarding FaDSS.

Procedure: Review the risk indicators in light of evidence that the participant is experiencing or anticipating barriers to participation in the FIA process. You may use either demographic risk indicators or family experience risk indicators or a combination of them as a basis for referral to family development services.

Consider referral for family development services if personal and family problems cannot be addressed by using PROMISE JOBS activities or through referral to community support resources. If these problems are barriers that cannot be dealt with any other way, referral for family development services may be appropriate.

The recommendation for family development services may be made at the beginning of the FIA process or at any time during the period of the FIA when it becomes apparent that family problems are a barrier to participation.

When you determine that family development services are appropriate as an FIA activity for a participant's family and not available through FaDSS, refer the participant to an agency that meets one of the following criteria:

- The agency has family development specialists certified by the University of Iowa College of Social Work, National Resource Center on Family-Based Services.
- The agency has a family development services plan that has been approved by the HHS Family Development and Self-Sufficiency Council.

Use family development services in two ways as a step toward self-sufficiency in the FIA:

- Family development services may be combined with other PROMISE JOBS components or FIA activities with concurrent participation.
- Family development services may be the only FIA step for a designated period when the family needs intensive services before other FIA activities will be appropriate.

You may include family development services in the FIA from agencies that meet one of the above criteria when the services are available at no cost to PROMISE JOBS. See [FIA Options for Clients Aged 19 and Younger](#) for policies for young parents.

If family development services are not available at no cost to PROMISE JOBS, use the PJCase system to issue payment for the cost of family development services.

The following section gives more information on including family development in the FIA.

Including Family Development in the FIA

Procedure: Coordinate services with the family development specialists so that the FIA is honored while allowing the flexibility that may be needed in the family development services.

Work with family development specialists and participants to write the FIA with family development services and any other FIA activities that are appropriate to the circumstances of the family. Choose other FIA activities that will not interfere with the family development services.

Decide together whether the FIA should contain details about the family development services or a simple statement that family development services is the FIA activity.

You, the participant, and the family development specialist can work with the FIA as part of the family development process, renegotiating and amending the FIA when there are changes in the participant's life circumstances.

Use targeted start and end dates for family development services. If you make a referral to family development services after the FIA has been developed, renegotiate and amend the FIA, involving all three partners in the FIA process.

You may write the FIA to include minimal activities until family development services are available when the following are true:

- Unusual family circumstances make it apparent that family development services are needed before the family can make progress toward self-sufficiency.
- The family wishes to accept family development services.
- Family development services are not available at no cost to PROMISE JOBS and PROMISE JOBS funding is not available.

In this situation, write the FIA to include the following:

- An ending date that includes the estimated time needed to receive and benefit from family development services.
- Interim goals that the family can work on, independent of family development services, which would improve family circumstances or enhance employability.

Do not **require** participants to include family development services in the FIA, except for the minor parents described above.

PROMISE JOBS participants who are using family development services may need help with child care and transportation costs. As with the FaDSS program, most activities are likely to be arranged so there are no costs for these supportive services or the service provider covers the costs. Where this is not true, authorize the supportive payment under PROMISE JOBS policies.

Do not consider that participants are choosing the LBP if they fail to follow through with family development referral or family development activities that are included in the FIA. The decision about satisfactory participation in family development services belongs to the service provider.

Establish a method that the service provider will use to notify you when they decide that participation has ended. This can occur because the participant no longer needs services, or because the participant is not working with the service provider.

When you are notified that family development services have ended at a time not indicated in the FIA, offer renegotiation and amendment of the FIA. Participants who do not participate in the renegotiation and amendment process are choosing the LBP.

Waiting Lists

Legal reference: 441 IAC 93.2(1); 93.4(4)

Policy: HHS has the administrative authority to prioritize services to FIP applicants and participants in the order that best fits the needs of FIP applicants and recipients and of the PROMISE JOBS program.

Due to state and federal budgetary limitations on the PROMISE JOBS program, referred persons who complete orientation and assessment may be placed on a waiting list for certain PROMISE JOBS activities or supportive services or payments, when appropriate.

Participants who are placed on a waiting list for a specific PROMISE JOBS activity shall include other activities in the FIA that are appropriate for the family circumstances while on the waiting list.

Procedure: When a waiting list is in effect for a certain PROMISE JOBS activity or supportive service or payment and you place a referred person on the waiting list for the activity give the person a copy of form 470-2925, *Notice of Waiting List Placement*. This notice informs referred persons of their placement on a waiting list and makes them aware of the ability to pursue the activity on their own while waiting for PROMISE JOBS services.

Remove participants from the waiting list and place them in the limited activity as funds and slots become available.

When a waiting list exists for postsecondary education, persons who were enrolled in approved postsecondary training at the time of FIP cancellation shall not be placed on the postsecondary training waiting list if the participant is still satisfactorily participating in approvable training at the time that FIP eligibility is regained.

A FIP applicant who was assigned a postsecondary training slot and in an approved training plan at the time of FIP cancellation and who reapplies for FIP does not retain their training slot if the person is no longer satisfactorily participating in the training plan.

If funding for a PROMISE JOBS activities included in a participant's FIA or required supportive payments are not available, the participant's FIA shall be renegotiated to include different activities.

Once a participant is taken off a waiting list for a PROMISE JOBS component or supportive service or payment and placed in a slot, the participant retains the slot even though assigned to another activity prior to assignment to the limited component or service.

FIA Contents

Legal reference: 441 IAC 93.4(239B)

Policy: The FIA shall include the goals of the family for achieving self-sufficiency and shall establish a time frame with a specific ending date, during which the family expects to become self-sufficient and after which FIP benefits will end. For individuals and families with acknowledged barriers, one or more incremental FIAs may be written.

Procedure:

In the FIA:

- Clearly establish interim goals necessary to reach the long-term goals of the family for achieving self-sufficiency.
- Include the FIA options that the FIA-responsible person chooses to reach their long-term goals, within the limits of PROMISE JOBS rules regarding each specific component.
- Establish a targeted start date and targeted end date for each activity. For FIP applicants, use a date that is no sooner than 30 days from the date the applicant filed their application for FIP benefits **unless** the applicant is already participating in the activity, i.e. employment or classroom training. When you receive e-mail notification that IM has approved FIP, send a *Notice of Appointment or Participation*, form 470-0813 for the first activity. See [Required Activity to End a Subsequent Limited Benefit Plan](#), for the exception.

Identify barriers to participation and include the FIA-responsible person's plan with appropriate referrals and necessary supportive services to eliminate the barriers.

- Outline the expectations of the PROMISE JOBS program and of the family.
- Include the FIA-responsible person's responsibility to provide verification of hours of participation and when the verification is due to PROMISE JOBS.
- Record the FIA-responsible person's response to the option of referral for family planning counseling as described at subrule 93.9(3).
- Avoid using abbreviations and acronyms. Acceptable acronyms include HHS, FIP, FIA, PJ, HSED, and abbreviations of local colleges.

- Stipulate supportive services to be provided by the PROMISE JOBS program, including:
 - Child care assistance
 - Transportation payments
 - Tools, uniforms
 - Tuition, books, fees
 - FaDSS or other family development services
- Establish a specific and realistic ending date by which the family expects to become self-sufficient because the family income is above FIP eligibility limits.

When establishing an ending date, consider the number of months a family has received FIP benefits. An ending date cannot exceed a family's 60-month FIP limit **unless** an extension due to a hardship has been granted. Access FET in the WISE system to determine the number of months of FIP eligibility that remain for the family.

Help the FIA-responsible person select a specific targeted ending date, considering a family's 60-month FIP limit, with all FIA activities leading towards reaching the FIA goal by that date. For individuals or families with acknowledged barriers, the family's plan may be written in one or more incremental FIAs all using the same targeted ending date.

The FIA-responsible person may:

- Select an ending date by laying out plans for a training goal and calculating the time that will be needed to fulfill the activities needed to reach that goal, or
- Select the desired ending date and choose PROMISE JOBS activities that will lead to self-sufficiency by that date.

In situations where further assessment has to be provided to enable the FIA-responsible person to make a well-informed decision, establish a targeted ending date based on available information. When the assessment is complete, renegotiate the FIA to adjust the targeted end date if needed.

For families whose circumstances, problems, or barriers make long-term planning difficult, complete a short-term incremental FIA that addresses specific family circumstances that need to be overcome before long-term planning can be effective. If not possible to determine a fixed targeted ending date, use a short-term ending date and renegotiate the FIA before the ending date as described at [Renegotiation and Amendment of the FIA](#).

Take into consideration any existing waiting lists for PROMISE JOBS supportive services or payments or components when establishing the FIA ending date.

Make every effort to select a targeted ending date that will remain fixed when family circumstances allow. It should not be regularly revised as the participant moves from one activity to another or from one provider agency to another, unless a revision is needed due to a problem, barrier, or a change in circumstances.

A minor setback in achieving interim goals does not necessarily mean that the ending date should be changed. A change in the ending date is considered to be necessary in circumstances as described below in [Renegotiation and Amendment of the FIA](#).

Guide FIA-responsible persons to realistic choices in establishing interim goals and target dates. Goals and target dates must be achievable.

To complete the FIA, you must ensure it is signed by:

- All FIA-responsible people who are included in the FIA as described at FIA-Responsible Persons.
- The PROMISE JOBS worker or workers.
- The PROMISE JOBS supervisor.

Family Violence Option

Legal reference: Iowa Code 239B.8(2)“i”; 42 CFR 260.51-260.59

Policy: The family violence option is available to an FIA-responsible person who is a survivor of domestic violence. The family violence option is a communication plan which can be included in the FIA to address or prevent domestic violence. PROMISE JOBS activities may be temporarily waived when appropriate for the FIA-responsible person’s situation.

All FIA-responsible persons must be informed of the family violence option.

Domestic violence is a one-time event or an ongoing pattern of behaviors to maintain power and control in an intimate relationship. Abusive behavior may include one or more of the following:

- Physical injury to a person, pets, or property
- Threats to harm the referred person or their children
- Threats to harm self
- Not allowing employment outside the household
- Not allowing association with other people and other forms of isolation
- Controlling all household money
- Accusations, name-calling and other verbal abuse
- Sexual assault
- Other forms of emotional abuse

Procedure: Offer the family violence option to survivors of domestic violence. Notify all FIA-responsible persons of the family violence option during orientation. If you have reason to believe that a domestic violence situation exists, see [Domestic Violence Referral](#) for protocol.

An FIA-responsible person who is a survivor of domestic violence may select the family violence option at any point during their participation in PROMISE JOBS. Include a communication plan in their FIA when the family violence option is chosen.

If paper casefiles are used, cases that contain the family violence option should be easily identified by PROMISE JOBS staff but not identifiable to referred persons. Use a colored file folder, a colored dot readily visible, or some other locally agreed upon identification to mark the case, in the event that back-up staff need to cover a family violence option case in the absence of the regular PROMISE JOBS worker.

The goal of the family violence option is to enable clients with domestic violence to work towards self-sufficiency in as safe a manner as possible. Although not true for all, most FIA-responsible persons should be able to make some steps towards self-sufficiency. Safety is the first priority; becoming self-supporting is second.

Refer victims of domestic violence for counseling and support services as appropriate to their individual circumstances. Offer a referral to FaDSS or other family development services. Waive any PROMISE JOBS requirements that make it difficult or place them at risk of further domestic violence for as long as necessary.

Since these situations vary greatly, no time limits are placed on waiving PROMISE JOBS activities. Use good judgment in waiving PROMISE JOBS participation. Remember that the 60-month lifetime limit of FIP benefits applies during the months that a family chooses the family violence option, so it is important that the family is working towards self-sufficiency as earnestly as possible.

Remember that PROMISE JOBS is *not* a provider of domestic violence services, but provide good information and make appropriate referrals. Provide people interested in the family violence option information about services available through the local domestic violence project.

Accept what the FIA-responsible person indicates is necessary to keep their family safe and to be able to move towards self-sufficiency safely, so long as the person is making good faith efforts to follow the steps of the FIA and stay safe.

However, the ability to follow the details of the communication plan or to participate fully in agreed-upon FIA activities may be hindered by the domestic violence.

An FIA-responsible person who provides good cause reasons due to domestic violence is not to be penalized for failure to participate according to the steps of the FIA. The person is responsible for providing the good cause reasons to PROMISE JOBS.

FIA-responsible persons are expected to keep PROMISE JOBS notified of any change in their situation when safety becomes or ceases to be a barrier to participation. When the FIA-responsible person is not able to participate in their FIA as written, the FIA should be renegotiated to allow the person to safely participate to the fullest of their capacity.

Communication Plan

Policy: A communication plan outlines how the FIA-responsible person will be able to safely participate in the PROMISE JOBS program. Every FIA-responsible person seeking a family violence option must have a communication plan as a part of the FIA, which must be reviewed every six months.

In two-parent families, the communication plan must be separate from the FIA. Confidentiality of this plan is essential, since the safety of the parent selecting the family violence option and their family may be at risk.

Procedure:

Composition of a communication plan might include:

- Referral to FaDSS or other family development.
- Referrals to domestic violence services in the area.
- Steps to keep the survivor's FIA information safe from their abuser in a two-parent case.
- How to continue to pursue becoming self-supporting, which might mean modifying the original FIA to include different activities not originally included at time of assessment, such as:
 - Employment where the female survivor is supervised by a female or the male survivor is supervised by a male.
 - Less aggressive schedule of training or employment.
 - A FaDSS-only component.
 - A change of a PROMISE JOBS worker to a worker that is acceptable to the survivor.
 - Acceptable work to the survivor.

- How to contact and communicate with the survivor safely.
- How the survivor will safely contact PROMISE JOBS to indicate an inability to participate or attend a meeting, a need for service or referral, perceived danger, or other circumstances.

FIA Activities for Convicted Drug Felons

Legal reference: Code of Iowa 239B.5(b)

Policy: An FIA-responsible person who is a convicted drug felon must participate in drug rehabilitation activities to verify that the person does not illegally possess, use or distribute a controlled substance except when:

- The person successfully completed any applicable drug rehabilitation and court-ordered probation or parole resulting from the drug felony conviction, or
- The person is currently on probation or parole and successfully completed all drug rehabilitation requirements resulting from the drug felony conviction (whether court ordered or required due to probation or parole).

This provision applies only to **convictions** for conduct occurring **after August 22, 1996**.

A convicted drug felon is a person who has been convicted under federal or state law of a felony that includes the charge of possession, use, or distribution of a controlled substance.

Procedure:

Consider a person who has been convicted under federal or state law of a felony that includes the charge of possession, use, or distribution of a controlled substance a convicted drug felon.

EXAMPLE:

A person referred to the PROMISE JOBS program is convicted for robbery. The crime of robbery also includes the possession, use, or distribution of a controlled substance. This person is a convicted drug felon.

Require an FIA-responsible person who is a convicted drug felon to participate in drug rehabilitation activities to verify that the person does not illegally possess, use or distribute a controlled substance except when:

- The person successfully completed any applicable drug rehabilitation and court-ordered probation or parole resulting from the drug felony conviction, or

- The person is currently on probation or parole and successfully completed all drug rehabilitation requirements resulting from the drug felony conviction (whether court ordered or required due to probation or parole).

Request verification that the participant meets one of these requirements, if questionable. If the participant meets one of these requirements, consider the participant not to illegally possess, use, or distribute a controlled substance. Document the basis for your decision.

Write the FIA to include attendance in drug rehabilitation activities for a convicted drug felon who is required to participate in rehabilitation activities as previously stated. Other suggested activities may include:

- Treatment or rehabilitation after-care activities
- Attendance at support groups
- Steps outlining the follow through with parole or probation requirements
- Referral for clinical substance abuse assessment
- Other activities to promote self-sufficiency

Self-disclosure of the drug felony conviction is the accepted procedure for identification. The *PROMISE JOBS Stepping Stones to Family Success*, Form 470-0806, includes the convicted drug felon self-declaration statement.

If PROMISE JOBS learns of a drug felony conviction from another reliable source, ask for verification from the county clerk of court. Drug felony convictions are a matter of public record. A release of information is not needed.

If the drug felony conviction is confirmed and the participant does not meet one of the exceptions described above, schedule an appointment to renegotiate the FIA to include steps to address the drug felony.

Including Other Self-Sufficiency Plans Into the FIA

Legal reference: 441 IAC 93.4(3)"b"

Policy: The FIA may include a self-sufficiency plan which the family has developed with another agency or person, so long as that self-sufficiency plan meets the requirements of these rules and is deemed by PROMISE JOBS staff to be appropriate to the family circumstances.

Procedure: Be sure that FIA-responsible persons have the opportunity to tell PROMISE JOBS staff about existing case plans with child welfare agencies or juvenile court, for example, in order to prevent conflicts or problems. Such other plans include, but are not limited to, Head Start, public housing authorities, child welfare workers, Vocational Rehabilitation, and FaDSS grantees.

Ensure that the activities of the FIA do not conflict with any other required activities or responsibilities that already exist for the family. Offer form 470-0429, *Consent to Obtain and Release Information*, so the FIA-responsible persons can authorize an exchange of pertinent information in such situations.

During orientation or initial assessment, be sure that FIA-responsible persons understand the following:

- They may choose to authorize an exchange of information between PROMISE JOBS and other service agencies, but are not required to do so.
- They may provide verification independently if reported conflicts are interfering with the activities of the FIA.

This information exchange can include, for example, assessment information as described at [Initial Assessment](#) and [Supplementing or Substituting Assessment](#), or activities or responsibilities that the family must meet under child welfare or juvenile court case plan requirements.

NOTE: A release is not needed to exchange information between PROMISE JOBS and IM or FaDSS that is necessary to provide services to the participant family.

Renegotiation and Amendment of the FIA

Legal reference: 441 IAC 93.4(8)

Policy: The FIA must be renegotiated to include a new plan for self-sufficiency when:

- The participant has participated satisfactorily in the current FIA activities but is not self-sufficient by the FIA end date.
- The participant demonstrates effort in carrying out the steps of the FIA but is unable to participate satisfactorily in the current FIA activities due to problems or barriers to participation.
- The participant's circumstances change to such an extent that the current FIA activities are no longer appropriate.

A participant who chooses not to cooperate in the renegotiation process after receiving a written reminder of the need to renegotiate the FIA is considered to have chosen the LBP unless the participant has an acceptable reason for not cooperating as described at [Problems With Participation](#) or [Barriers to Participation](#).

Procedure: Renegotiate and amend the steps of the FIA to describe the new plan for self-sufficiency, extending the time frame in relationship to the family's 60-month lifetime FIP limit, if the FIA responsible person meets the following criteria:

- The participant has participated satisfactorily in the current FIA activities but is not self-sufficient by the FIA end date.
- The participant demonstrates effort in carrying out the steps of the FIA but is unable to participate satisfactorily in the current FIA activities due to problems or barriers to participation.
- A short-term incremental FIA was written as the family's problems, barriers, or other circumstances made long-term planning ineffective or the participant is unable to achieve self-sufficiency within the period specified in the FIA.
- The participant has enough months remaining in the 60-month lifetime limit of FIP benefits.
- The participant's months of FIP eligibility are less than the dates shown on the participant's *Family Investment Agreement*, form 470-3095, or *FIA Steps to Achieve Self-Sufficiency*, form 470-3096.
- The participant's circumstances change to such an extent that the current FIA activities are no longer appropriate.

Authorize supportive payments when needed for participating in the renegotiation process if otherwise allowable.

Do not wait until the FIA activity end date or the FIA ending date has been reached to determine whether the participant has demonstrated effort and has carried out the steps of the FIA. This is an ongoing process.

A referred person must possess a valid FIA as defined at [FIA Requirements](#) except in those rare instances when a FIP recipient loses exempt status.

Establish and document an ongoing monitoring plan and appropriate procedure for verifying that a participant is demonstrating effort and is truly carrying out the steps of the FIA with regard to the current activity. Use all appropriate PROMISE JOBS component participation and documentation policies. See [FIA Progress Review](#) for more information.

See [Required Verification and Documentation](#), for specific information on documentation that can be used or required from the participant.

For a discussion of procedure specific to participants who are employed full time, see [Full-Time Employment](#).

Determine whether the participant has chosen the LBP at any time it becomes evident that the participant is not carrying out one of the steps of the FIA.

Do not automatically offer renegotiation and amendment.

Do not automatically move the participant to the next FIA activity.

Use the policies of [FIA Participation Issues](#) and any other applicable policies regarding the choice of the LBP to make that determination.

If you determine that the participant has not chosen the LBP, an offer to **renegotiate and amend** is the next step.

Participants who choose not to cooperate in the renegotiation process have chosen the LBP. Attempt to resolve the issue as described at [FIA Participation Issues](#).

Do **not** wait until the FIA expires to renegotiate and amend the FIA when appropriate. FIAs for families who are utilizing short-term incremental agreements to address barriers to employment should be renegotiated before the FIA end date to avoid any time the family is receiving FIP without possessing a valid FIA.

Either the participant or PROMISE JOBS can ask to have the FIA renegotiated and amended at any time that:

- Newly revealed barriers to participation must be included in the FIA.
- [Problems With Participation](#) are severe enough or long term enough that they will interfere with efforts toward self-sufficiency.
- A change in life circumstances indicates that the steps of the FIA no longer fit the participant or family.
- An incremental FIA is due to expire.
- Self-sufficiency will not be achieved by the ending date.

Establish an appointment date to renegotiate the FIA, accommodating the work or other participation circumstances of the participant to the extent possible.

For example, when a child is born or is to be born after the FIA is signed, it is appropriate for PROMISE JOBS to ask that the FIA be renegotiated and amended if the Family Leave Act policies are not already included the FIA.

Require the participant to renegotiate and amend the FIA (before the birth if possible), including:

- The participant's choice of family leave under the policies of the Family Leave Act of 1993 (as described at [Problems With Participation](#)); and
- Any necessary changes in future activities or the self-sufficiency date.

Because future activities are already planned, there will be no delay in participation at the end of the period chosen for family leave.

Make the reason and need for the appointment clear to the participant. Document the letters, notices, and telephone calls used in the appointment process.

Provide information on the LBP to the participant. Whether the participant chooses not to carry out the renegotiation and amendment of the FIA before or after its ending date, the policies above still apply.

Using the FIA Document in Renegotiation and Amendment

Legal reference: 441 IAC 93.4(8)

Procedure: It is appropriate to use new pages of *Family Investment Agreement*, form 470-3095, and *FIA Steps to Achieve Self-Sufficiency*, form 470-3096, at the time of renegotiation and amendment if you and the participant prefer to do so.

You and the participant may not always need to complete new versions of the document. As long as the FIA document, including the changes, is easy to read and understand for any person who may have occasion to read it, you may modify the existing document. However, if one page of the document needs to be replaced for clarity, replace both pages.

To modify the document, you and the participant may:

- Cross out to eliminate any information that no longer applies.
- Cross out and replace any information that no longer applies.
- Add new information.

The participant must initial each changed or added item. In addition, you, the participant, and the PROMISE JOBS supervisor must:

- Re-sign or initial the document signature lines.
- Re-date the date lines at the bottom of the page.

Give the participant a copy of both pages of the modified document.

FIA Progress Review

Legal reference: 441 IAC 93.4(7)

Policy: A progress review of each FIA must be completed at least once every six months.

An FIA progress review is a regular evaluation of the case file and family situation to make certain that the family's current FIA goals and activities are appropriate and that the family is making progress towards those goals.

It is expected that an FIA progress review will:

- Reinforce participant awareness of and accountability for PROMISE JOBS program requirements.
- Demonstrate PROMISE JOBS worker interest and support of participant success.
- Strengthen participant and worker relationship.
- Provide participant regular access to their worker for help with addressing changing needs.
- Give PROMISE JOBS workers up-to-date information on the participant's current situation and involvement in FIA activities.

The progress review must include contact with and input from the FIA-responsible family member. A face-to-face interview is not required. A review that consists of communicating by mail only shall be used only as a last resort and the reason must be documented in the case file.

At least one FIA-responsible family member must participate in the review process.

A participant who fails to participate in an FIA progress review after PROMISE JOBS has sent the participant a written reminder and scheduled another FIA progress review is considered to have chosen an LBP.

Procedure: Complete a progress review of each FIA at least once every six months. An FIA progress review may be completed beyond the 6-month limit when there are participant problems or barriers as described at [Problems With Participation](#) or [Barriers to Participation](#).

EXAMPLE of determining progress review due date:

- FIA is signed and/or FIA progress review completed in September.
- The next FIA progress review is due no later than March of the next year.

Conducting progress reviews more frequently than once every six months may be necessary. Consider the following circumstances:

- A history of LBPs (2 or more).
- Last year of FIP due to 60-month limit.
- Zero or very low hours of participation.
- Multiple barriers.
- Currently in a six-month hardship period.

Require at least one FIA-responsible family member to participate in the FIA progress review process. However, you may require more than one FIA-responsible member to participate in the review process when there is a need for contact with more than one member. A face-to-face may be more appropriate in this instance.

When there is more than one FIA for the family, complete a review with at least one FIA-responsible family member for each FIA.

EXAMPLES:

- In a two-parent family, both parents sign the FIA but only one must participate in the progress review.
- When a minor parent receives FIP with an adult parent, the minor parent and adult parent sign separate FIAs and both must participate separately in the progress review. You may schedule the minor parent and adult parent for the same time and alternate the conversation between the parents when conducting the review interview whether by phone or in-person.
- When an FIA-responsible child who is not a parent receives FIP with an exempt parent, the child signs an FIA and must participate in the progress review.

Schedule the phone or face-to-face contact by sending *Notice of Appointment or Participation*, form 470-0813.

When the FIA includes more than one FIA-responsible family member, use the following as *guidance* when selecting which member to schedule for the FIA progress review when only one member must participate:

- If the FIA includes a child and a parent, select the parent.
- If the FIA includes two parents:
 - Select the parent that is participating the least amount of hours, or
 - Select the parent with activity hours that conflict the least with normal PROMISE JOBS working hours, or
 - Select the parent with the majority of problems or barriers, unless it is difficult for the parent to participate in a phone or face-to-face interview.

- Select the parent that communicates with PROMISE JOBS most often regarding the family's situation.
- If the FIA includes two parents, you may address the *Notice of Appointment or Participation* to both parents and note on the form that only one parent needs to call for the phone interview, or appear for the appointment.

Review the circumstances of the entire family when conducting an FIA progress review, even if only one FIA-responsible family member is participating in the review.

Prior to the scheduled interview, review the case files of all FIA-responsible family members to become familiar with the following:

- | | |
|--|---|
| ▪ Current FIA and FIA end date | ▪ LBP history |
| ▪ Current level of participation | ▪ Number of months left on FIP |
| ▪ IowaWORKS data to ensure it is current and accurate | ▪ Any outstanding needed documentation |
| ▪ Any reports or information from other agencies that are involved with the family | ▪ Most recent <i>Stepping Stones</i> , form 470-0806, to make note of any areas of concern or questions you want to ask during the review. |
| ▪ Past identified barriers to make note of any areas of concern or questions you want to ask during the review | ▪ Consider other services/supports (from other agencies/programs) that may serve this person's needs or assist in progress towards self-sufficiency |
| ▪ Hardship information, if applicable | ▪ FSSG amounts used / future needs |

In addition, consider the following four domains to determine the items that you need to discuss during the interview. Within each domain are examples of questions in italics that you can use as a "script" or reminder for discussion points:

Domain 1: Status of current FIA goals and steps

- Discuss the current FIA activity to determine progress and if there are any issues. "How are your HSED and individual job search going for you?"
- Discuss the next step, when it is scheduled, and if still appropriate.
- Discuss if additional or different activities need to be included in the FIA. Consider the circumstances to guide the participant to appropriate new or different activities. "Since you have not been able to find a job yet, would you like to try working at a work experience site to learn some skills?"

- If there have been recent problems with participation, discuss the problems to determine if the participant needs help or guidance from you. “You didn’t _____ (i.e., get your time and attendance in on time). What happened? Is there something that we can do to help so this doesn’t happen again?”
- “Is your child care provider working out? Do you need any changes?”
- “How is your transportation?”
- Determine if referrals are needed to other services (FaDSS, therapy, VR, others) or if FSSG may be appropriate.
- Discuss the number of months left in the 60-month limit. “You have _____ months left of FIP, how best can we help you reach your goals? Do we need to change your goals?”

Domain 2: Life Changes

Discuss household composition, housing situation, and question the participant about legal issues and health. Ask about the possibility of domestic violence. Examples:

- “Any changes in who is in your home?”
- “Any housing issues or problems?”
- “Any new legal issues? How is your divorce progressing?”
- “How is your health? How is the health of your family members?”
- “Are you in a relationship with another adult that has threatened or hurt you or your children? Do you worry about the safety of you or your children?”

Domain 3: Employment

Discuss current employment status.

- If employed:
 - “Any changes in your work hours or benefits?”
 - If no increase in wages or hours... “Is there something we can do to help you increase your pay/hours?”
- If not employed and employment is a current or upcoming FIA activity:
 - “What type of jobs would you like to have?”
 - “Do you have the skills and knowledge you need to get those jobs?”
 - “If not, is there anything we can do to help you gain those skills or get that knowledge, such as additional training or work experience?”

Domain 4: Rights and Responsibilities

Verbally review the participant responsibilities stated in *Your FIA Rights and Responsibilities*, form 470-3104, with the participant. In addition, remind the participant that they always have the right to speak to or meet with a supervisor.

Remind the participant that if they do not participate in their FIA activities, they will enter a limited benefit plan and FIP benefits will be reduced or stop.

Do not require the participant to resign and date this form as part of the review process.

The FIA does not need to be renegotiated as part of the FIA progress review process. However, you and the participant may decide that the FIA needs to be renegotiated as a result of information obtained during the review. Renegotiate the FIA during the FIA progress review if possible, regardless if the review is conducted over the phone or in-person. When negotiating an FIA over the phone, send a copy to the participant to be signed and returned within 10 calendar days.

When you meet with a participant to develop a new FIA or to renegotiate an existing FIA, always consider this as an opportunity for an FIA progress review. If possible and appropriate, complete an FIA progress review when you are meeting or talking with a participant for other reasons, even if a progress review is not due.

When writing a new or renegotiated FIA, determine an appropriate review date that is no more than six full months from the date the FIA is signed. Code IowaWORKS with a “task” to alert you at least one month before the next progress review is due for each FIA-responsible family member.

When you complete an FIA progress review, document the completion of the review in the participant’s case file narrative and through entry of a “case note” in the IowaWORKS system.

Contact your PROMISE JOBS Coordinators at IWD if you have questions on IowaWORKS entries.

If a participant is scheduled to participate in an FIA progress review and fails,

- Send a written reminder as described at [FIA Participation Issues](#).
- Schedule another FIA progress review appointment by sending another *Notice of Appointment or Participation*, form 470-0813.

If the participant fails to appear for the appointment, the participant has chosen an LBP unless the participant has an acceptable reason for missing the appointment as described at [Problems With Participation](#) or [Barriers to Participation](#).

FIA and Grace Period Following Denial of a FIP Application

Legal reference: 441 IAC 40.23(4)

Policy: When IM denies a FIP application for failure to provide requested information or for failure to attend the FIP application interview, IM will allow the applicant a 14 calendar day “grace period” to correct the reason for denial. IM will reconsider FIP eligibility without a new application if the applicant corrects the reason for denial and takes all action to establish eligibility within 14 days of the date on the Notice of Decision denying the application. This includes:

- Providing all necessary information to establish eligibility, including verification of any changes,
- Signing the required FIA if one has not yet been signed.

The grace period does not apply to FIP applications that are denied for reasons other than failure to provide requested information or failure to attend the FIP application interview. This means that the grace period does **not** apply when a FIP application is denied for failure to attend an FIA interview or for failure to complete 20 hours of work activities when reconsidering the choice of a subsequent LBP.

Procedure: If an FIA was signed before the FIP denial and the person is not reconsidering a subsequent LBP, IM approves FIP as the FIA-responsible person corrects the denial within the grace period, IM will not re-refer the applicant to PROMISE JOBS during the grace period. Reinstate the existing FIA.

If an FIA was not signed prior to the FIP denial and there is no FIA appointment available within the grace period, IM will inform the family that they need to file a new FIP application.

Refer to [Referring Persons During FIP Grace Period](#) for procedures for the following situations:

- An FIA was not signed before the FIP denial, there is an FIA appointment available within the grace period and the applicant does not need to reconsider a subsequent LBP.
- An FIA was signed prior to the FIP denial and the applicant needs to reconsider a subsequent LBP.
- An FIA was not signed before the FIP denial and the applicant needs to reconsider a subsequent LBP.

FIA and a Break in FIP Assistance

Legal reference: 441 IAC 93.4(2)

Policy: When FIP is canceled, the responsibility for carrying out the steps of the FIA ends as of the effective date of FIP cancellation. A person cannot be held responsible for an FIA when no one in the household is eligible for FIP. When FIP is canceled, an FIA that was signed before the effective date of cancellation is no longer in effect. The former FIP/PROMISE JOBS participant is ineligible for FIP and has no responsibility to PROMISE JOBS or the FIA.

A “break in FIP assistance” is defined as any time a new FIP application is required to regain FIP eligibility, even if there is not a break in the family’s receipt of the cash grant.

Procedure: Prior to scheduling a participant for an FIA activity, check their FIP status to be sure the family is still receiving FIP.

When you become aware that FIP has canceled, stop all efforts to engage the participant in their FIA activities as of the effective date of FIP cancellation.

The PJCase system will send IWD notification of FIP cancellations in the nightly referral file which IWD uses to update IowaWORKS.

You may also use the following resources to determine a participant’s FIP status and if canceled, the FIP negative date:

- View the HHS System Summary in IowaWORKS
- Check the PJCase system

FIP may be reinstated without an application when eligibility is reestablished prior to the effective date or within the 14-day “grace period”. Refer to [FIA and FIP Reinstatement](#) for FIA reinstatement procedures.

An existing FIA may be reinstated if the family reapplies for FIP following a break in assistance. Refer to [FIA and a Break in FIP Assistance of One Month or Less](#) for more information.

FIA and FIP Reinstatement

Legal reference: 441 IAC 40.22(5)

Policy: When FIP is canceled for any reason, FIP will be reinstated without a new application when all information is provided before the effective date of cancellation and FIP eligibility can be reestablished. If the FIA-responsible person does not provide all information needed to reestablish eligibility before the effective date of cancellation, the family will need to reapply to regain FIP eligibility unless the “grace period” applies.

“Grace period”:

FIP will be reinstated without a new application if the FIA-responsible person provides all information necessary to establish eligibility, including verification of any changes, within 14 days of the effective date of cancellation when FIP was canceled for one of the following reasons:

- Failure to provide requested information,
- Failure to return a completed RRED (Review/Recertification Eligibility Document),
- Failure to complete a required FIP review interview,
- Failure to meet residency requirements (mail is returned to HHS).

If the FIA-responsible person does not provide all of the information needed by the 14th day after the effective date of cancellation, IM will take no further action. The family will need to reapply to regain FIP eligibility.

Procedure: When FIP is reinstated without an application, reinstate the FIA that was signed in the prior FIP eligibility period. Reinstatement the FIA even if the FIA has expired, but only when the person who signed the FIA did not become exempt from FIA responsibility for a reason other than school attendance after signing the FIA.

When FIP is reinstated without an application:

- The FIP notice of decision includes the following statement: “If you have a signed Family Investment Agreement (FIA), it is again in effect. If you do not follow through with your FIA steps you will enter a limited benefit plan. If you have questions concerning your FIA, contact your PROMISE JOBS worker.”
- The PJCase Person screen displays FIP Status as “Reinstated” or “Reopened” and the effective date of the reinstatement will be in the Effective Date field.

Resume case management of the existing FIA as soon as you are notified that FIP is reinstated:

- Issue any required written notice for the current or next FIA activity:
 - If the current FIA activity is employment or training and the FIA includes the activity and the specific verification requirements, the FIP reinstatement notice is sufficient notice that the FIA requirements are reinstated.
 - If the current FIA activity is job search, issue a *Notice of Appointment or Participation* stating that the participant must resume job search according to the *Job Search Plan Agreement* as of the first day of the week that begins at least 10 calendar days from the day the *Notice* is mailed.

- For other FIA activities, mail a *Notice of Appointment or Participation* or other written notice to remind the participant to attend the activity or to provide verification as scheduled when the participation date or the due date is at least 10 calendar days from the date the notice is mailed. Reschedule an activity for a later date or extend a due date when the current date is less than 10 calendar days from the date a notice will be mailed.
- Issue transportation and other supportive payments that are needed prior to participation in activities for the current month. The effective date of eligibility is the FIP effective date or the first day of need, whichever is later.
- Child care:
 - If the FIA includes activities other than employment and the case was not transferred to HHS, reinstate the closed child care case as of the FIP effective date or the first day of need, whichever is later.
 - If the FIA includes activities other than employment and the child care case was transferred to HHS as a CCA need continued after FIP canceled, contact HHS to ask that the child care case be transferred back to you. Update KinderTrack as needed upon transfer. Start child schedules as of the FIP effective date or the first day of need whichever is later for any FIA activity that would not meet CCA requirements if the family was not on FIP.
 - If the only FIA activity is employment or there is a protective CCA need, HHS will continue to handle the CCA.
- If the FIA is expired or needs renegotiation for other reasons, schedule an appointment to discuss renegotiation of the FIA.

Do not consider any failure to participate that occurs on or after the effective date of FIP cancellation up until the FIA-responsible person is adequately notified of the requirements of the reinstated FIA to count towards the choice of an LBP:

- If the current FIA activity is employment or postsecondary training and the FIP reinstatement notice is sufficient notice that the FIA requirements are reinstated, do not count any failure that occurs on or after the effective date and up until 2 working days after the reinstatement notice is mailed. A FIP reinstatement notice is mailed on the 1st working day after the FIP warrant issue date in the HHS ISSV system.
- If the current FIA activity is job search, do not count any failure that occurs before the date specified in the *Notice of Appointment or Participation* that was mailed after FIP was reinstated (see the preceding paragraph).
- For other FIA activities, do not count any failure that occurs on or after the effective date up until the participation date or the due date stated in the notice that was mailed after FIP was reinstated (see the preceding paragraph).

When IM reinstates FIP after the effective date of cancellation and the FIP family contains a person who recently became FIA-responsible who has not yet signed an FIA (i.e. a child who has dropped out of school), resume efforts to get the person to sign an FIA. See [Referring Participants](#) for more information.

The PJCase system will send IWD notification of FIP cancellations and reinstatements in the nightly referral file.

For cancellations for failure to return a complete RRED, PJCase delays sending notification to IWD until the day after the effective day of cancellation when FIP has not been reinstated by then.

Break in Assistance of One Month or Less

Legal reference: 441 IAC 93.4(9)

Policy: When an FIA-responsible person reapplies for FIP following a break in assistance of one month or less, an FIA that was signed prior to the FIP cancellation may be reinstated if the FIA is valid and meets the family's current circumstances.

Procedure: When a break in FIP assistance is one month or less, and a valid FIA exists, reinstate the contents of the existing FIA. Resume case management at the point it was discontinued before the break in assistance occurred. Renegotiate and amend the reinstated FIA only if needed to accommodate changed family circumstances.

IM staff schedule all FIP applicants with an FIA appointment as IM is unable to determine if the FIA continues to meet the family's circumstances.

When a valid FIA exists that meets the family's current circumstances, notify the IM worker that IM can proceed with application processing by making entry in PJCase that an FIA was signed within one working day of receiving the referral. No interview is required because a valid FIA exists. At the same time, attempt to call the applicant to explain that you are reinstating the existing FIA and the participant does not need to attend the FIA appointment. Reinstate the existing FIA by sending the participant form 470-3300, *Your Family Investment Agreement Reminder*, along with a copy of the existing FIA. This form reminds the participant of the FIA obligation and offers the opportunity to renegotiate and amend the reinstated FIA.

The participant and PROMISE JOBS do not need to re-sign a reinstated FIA when the FIA does not change.

When the existing FIA cannot be reinstated or the applicant did not have a signed FIA prior to FIP cancellation, follow the procedures at [Service Upon Referral](#).

The following are examples for determining the length of the break in assistance.

- | | | | |
|----|--------|--------------------|------------|
| 1. | Ms. A: | FIP cancellation | January 01 |
| | | effective | January 03 |
| | | Reapplication | January 10 |
| | | Re-referral | January 20 |
| | | Approval | January 10 |
| | | FIP effective date | |

Ms. A's break in assistance is less than one month. She has received some benefits for the month of January. On her ISSV screen, benefits are recorded for December, January, and February.

- | | | | |
|----|--------|--------------------|------------|
| 2. | Ms. B: | FIP cancellation | January 01 |
| | | effective | January 20 |
| | | Reapplication | January 21 |
| | | Re-referral | January 17 |
| | | Approval | January 27 |
| | | FIP effective date | |

Ms. B's break in assistance **is less than one month** because she has received some January benefits, even though she did not actually get them until February. On her ISSV screen, benefits are recorded for December, January, and February.

- | | | | |
|----|--------|--------------------|------------|
| 3. | Ms. C: | FIP cancellation | January 01 |
| | | effective | January 20 |
| | | Reapplication | January 27 |
| | | Re-referral | January 17 |
| | | Approval | January 01 |
| | | FIP effective date | |

Ms. C was over income for the month of January. Therefore, the effective date is February 1st.

Ms. C's break in assistance **is exactly one month**. She received full benefits for February even though she did not receive them until later in the month. Her ISSV screen records benefits for December and February. Check the PJCase Person for the effective date to see if the break was more than one month.

- | | | | |
|----|--------|--------------------|------------|
| 4. | Ms. D: | FIP cancellation | January 01 |
| | | effective | January 31 |
| | | Reapplication | January 05 |
| | | Re-referral | January 17 |
| | | Approval | January 07 |
| | | FIP effective date | |

Ms. D's break in assistance **is more than one month**. Even though she received some February benefits, she did not receive them to cover the entire month. On her ISSV screen, benefits are recorded for December and February. Check the PJCase Person screen for the effective date to see if the break was more than one month.

- | | | | |
|----|--------|--------------------|-------------|
| 5. | Ms. E: | FIP cancellation | February 01 |
| | | effective | February 03 |
| | | Reapplication | February 10 |
| | | Re-referral | February 25 |
| | | Approval | February 10 |
| | | FIP effective date | |

Ms. E's break in assistance **is more than one month**. Both application date and effective date are in the second month of ineligibility. On her ISSV screen, benefits are recorded for December and February.

6. Mr. H's FIP grant was calculated to be \$8.00 for January, due to increased earnings. DHS makes FIP payment only when the grant amount is ten dollars or more, so Mr. H does not receive a warrant, even though he and his children continue to be regarded as FIP recipients.

Mr. H has had no break in assistance. He and his children continue to be regarded as eligible for FIP. He continues to be responsible for carrying out the steps of his FIA. ISSV shows no grant amount, but the PJCase Person screen shows the case as eligible.

Break in Assistance of More Than One Month

Legal reference: 441 IAC 93.4(9)

Policy: When a break in FIP assistance is more than one month, the FIA process must be completed again. The FIA is no longer valid, and the participant should be treated just like a new referral for PROMISE JOBS service.

Procedure: See [Service Upon Referral](#) to begin the steps of either:

- Resigning and redating the previous FIA or
- Writing a new FIA.

Consider the following factors for families in this situation:

- The family may be able to use the same steps that appear in the FIA that was signed before eligibility was lost. If appropriate, include these steps in a new FIA.
- A change in circumstances may mean that the terms of the former FIA do not fit the family any longer. Write a new FIA to address the changes.

Dealing With Breaks in FIP Assistance

Legal reference: 441 IAC 93.4(9)

Procedure: Once you are alerted to any **break-in-assistance** situation, evaluate the following circumstance: Is the break more than one month?

- If **yes**, refer to [Service Upon Referral](#) for information on how to proceed.
- If **no**, the chart on the following page illustrates how to deal with this situation.

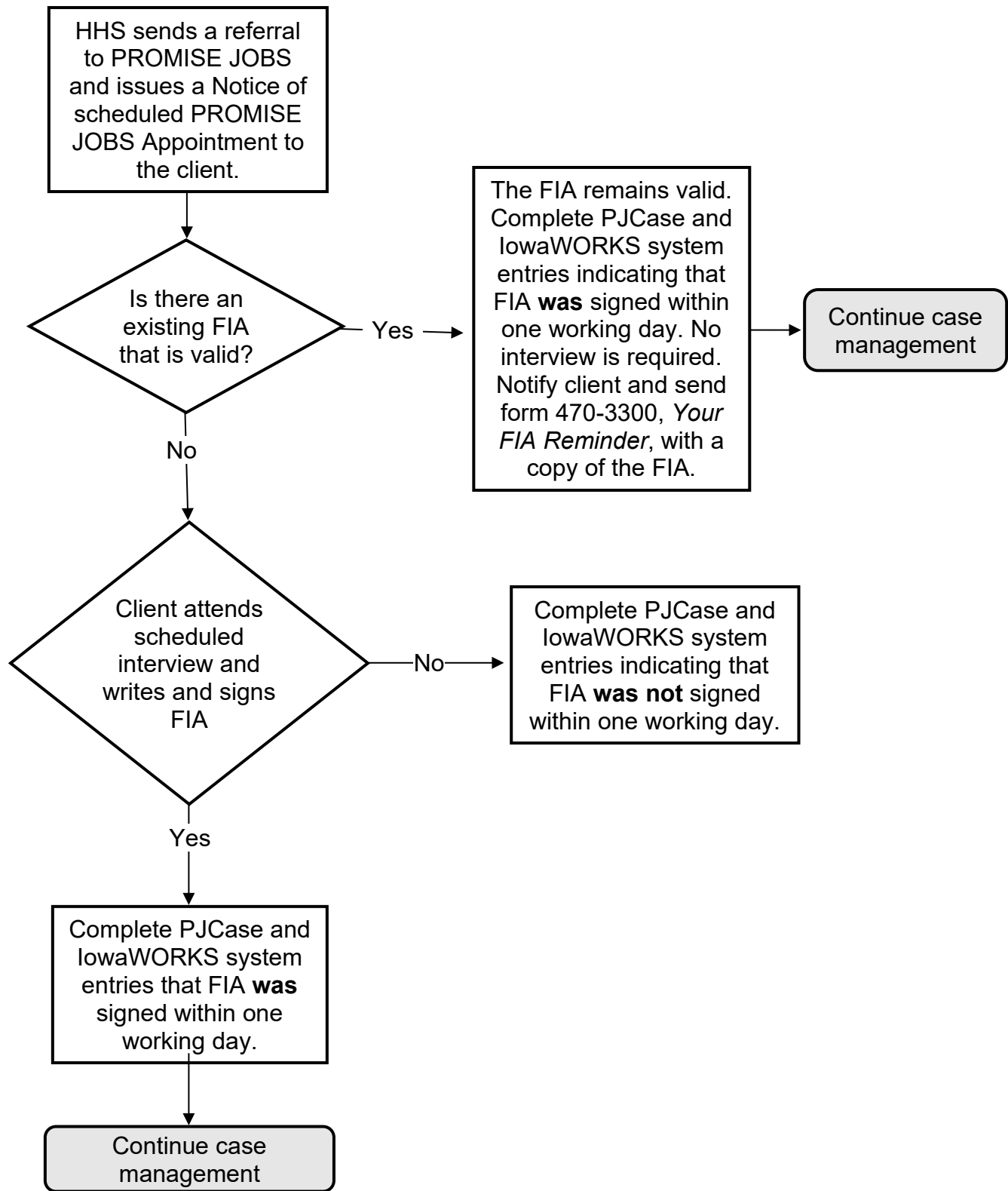
Participants may experience a break in assistance of one month or less when they are already failing to participate in the steps of their FIA, and PROMISE JOBS has begun the LBP resolution process.

In these situations, **do not stop** the LBP resolution process. Send the participant form 470-3300, *Your Family Investment Agreement Reminder*, as soon as possible, while continuing to resolve the LBP.

When participants who experience a break in assistance **are** currently participating in their FIA steps, send *Your Family Investment Agreement Reminder* as soon as possible while continuing case management.

When you have determined that the participant has chosen an LBP, refer the case for review. See [Review of Limited Benefit Plan Recommendation](#).

Break in FIP Assistance of One Month or Less



Remember, a break in FIP assistance of one month or less does interrupt the FIA process. The participant is not required to participate during the break in assistance between the date the case is canceled and the date the participant is referred back to PROMISE JOBS.

Case management should resume after the participant is referred because the FIA remains valid. Examples:

1. Ms. A is a new (original) referral to PROMISE JOBS. She receives FIP in April and May but is canceled June 1 for failure to provide documentation to HHS. She must reapply to get FIP benefits again, and does so on June 12. She is referred back to PROMISE JOBS on June 19, after experiencing a break in FIP assistance of less than one month.

If you determine that a valid FIA exists, notify Ms. A and send form 470-3300, *Your Family Investment Agreement Reminder*, along with a copy of the current FIA to Ms. A. Complete PJCase and IowaWORKS system entries indicating that an FIA was signed.

2. Mr. B has failed to provide required classroom training documentation and appears to be choosing an LBP. On May 29, PROMISE JOBS sends him a reminder letter to inform him of this potential choice, to attempt to resolve the issue, and to offer supervisory intervention if he responds by June 5.

However, Mr. B goes off FIP assistance as of June 1 because he fails to return employment information. He reapplies for FIP on June 2, and is re-referred to PROMISE JOBS on June 9.

Mr. B has experienced a break in FIP assistance beginning June 1 and lasting until June 9. Since Mr. B was not obligated to respond to the written reminder letter as of June 1, PROMISE JOBS must resolve this issue at the scheduled appointment to write and sign an FIA as an eligibility factor for Mr. B's family to be approved for FIP.

3. Ms. C is scheduled to attend job readiness skills training starting on June 5. However, she fails to return her RRED, and is required to reapply for FIP in June to get benefits again. She does reapply for FIP on June 13.

Therefore, Ms. C experiences a break in FIP assistance beginning June 1 that lasts until she is reapproved to FIP on June 20. In this situation, PROMISE JOBS must amend the FIA to reschedule Ms. C for the next available job readiness skills training.

The missed June 5 Job Club would not indicate an LBP choice, since Ms. C was not a FIP recipient at the time the job readiness skills training was held and was not required to participate with PROMISE JOBS

Job Readiness and Job Search Options

Legal reference: 441 IAC 93.6(239B)

Policy: Job Readiness/Job Search options are flexible to allow for different levels of readiness and to allow FIA-responsible persons to use in combination with other FIA activities. FIA-responsible persons with recent ties to the workforce may be able to immediately enter into individual job search activities. Others may need to build skills, develop job-seeking tools, and gain job-seeking experience before job search can be successful.

Job readiness and job search activities include:

- Job readiness skills training
- Structured job search
- Individual job search
- Unplanned job opportunities
- Rehabilitation activities: mental health treatment, substance abuse treatment, and other rehabilitation.

FIA-responsible persons may also use job readiness options offered by IWD through the Workforce Innovation and Opportunity Act (WIOA) and those offered by other agencies as an FIA activity.

Procedure: When you are meeting with the FIA-responsible person to develop their FIA, discuss the different job readiness/job search options that are available. In choosing suitable options take into account the following:

- Previous work and training history
- Current skills and education levels
- Existing job seeking skills
- Need for training in job readiness skills and life skills
- Life circumstances of the participant including identification of possible barriers

You may encourage FIA-responsible persons to use more than one job readiness/job search option in the FIA. For example, if you believe that a person is likely to find employment after participating in job readiness workshops, write the FIA so that individual job search follows participation in the job readiness workshops.

Some job readiness/job search options are difficult to participate in full time. Consider combining these activities with other FIA activities. For example, pairing individual job search with unpaid community service or combining rehabilitation appointments with education or training.

Hours of attendance in job readiness activities and the actual time spent making job search contacts must be documented and verified by either the PROMISE JOBS case manager, the participant, or the agency providing the job readiness training. The responsibility of providing hours of attendance in job readiness and the actual time spent making job search contacts is based on the activity and whether the service is provided by PROMISE JOBS or a non-PROMISE JOBS service provider. PROMISE JOBS must also report actual hours of participation that have been documented and verified in job search and job readiness activities through entry in the IowaWORKS system.

The following sections give more information regarding each job readiness and job search option, including available supportive payments:

- [Job Readiness Skills Training](#)
- [Structured Job Search](#)
- [Individual Job Search](#)
- [Unplanned Job Opportunities](#)
- [Rehabilitation Activities: Mental Health, Substance Abuse, and Other Rehabilitative Treatment.](#)

Job Readiness Skills Training

Legal reference: 441 IAC 93.6(1)

Policy: Job readiness skills training prepares participants to search for work and may consist of:

- Interest and skills assessment.
- Self-esteem building and motivational exercises.
- Identifying and eliminating employment barriers,
- Resume development,
- Completing job applications and follow-up letters.
- Obtaining interviews and telephone skills.
- Interviewing skills development and exercises.
- Goal attainment planning
- Soft skills/life skills
- Job market trends
- Self-marketing and positive attitude building
- Job retention skills

PROMISE JOBS provider agencies must offer and provide job readiness skills training to PROMISE JOBS participants.

Job readiness skills training may be combined with structured job search activities. See [Structured Job Search](#) for more information.

Procedure: Provide job readiness skills training in weekly sessions consisting of 30 hours of participation during a week. Require participants to participate daily in the training.

Training may include group discussions, role-playing or other teaching methods that provide instruction and experience in how to apply for employment and to participate effectively in employment interviews.

Provide a written notice when scheduling participants for job readiness skills training that clearly provides the date(s), time(s), and address of the PROMISE JOBS site and allows the participant at least 10 calendar days to appear. See [Written Notice to Participant](#) for more information.

Participants who miss any portion of a job readiness skills training session may be required to either make up the missed portion of the session or to retake the entire week of training based practical judgment by the case manager and participant need.

Participants who obtain employment while scheduled for job readiness skills training are required to continue the training except when the scheduled hours conflict with the scheduled hours of employment.

Document actual hours of participant attendance in job readiness skills training in the participant case file.

Report actual hours of participation in job readiness skills training through entry in the IowaWORKS system. Report any scheduled hours of job readiness skills training missed for an excused reason as described at [Problems With Participation](#) and [Excused Absence and Holiday Hours](#).

Consider that a participant has chosen an LBP when the FIA includes job readiness skills training as an activity and the participant fails to attend or satisfactorily participate in job readiness skills training according to policies at [FIA Participation Issues](#).

After attending job readiness skills training sessions, participants should:

- Be prepared to understand and function in the interview process and in the work place.
- Have the tools needed for an effective work search, such as a resume.
- Have the ability to successfully conduct a job search.

Supportive Payments for Job Readiness Skills Training

Policy: Participants are eligible for transportation and Child Care Assistance (CCA) when needed to participate in job readiness skills training.

Procedure: Use PJCase system to issue transportation supportive payments to a participant before the start of job readiness skills training. **EXCEPTION:** Contact IWD QA staff for instructions on how to proceed with participants who are not in PJCase due to not having an SSN.

Approve CCA before the start of the job readiness skills training. Use form 470-4558 or 470-4558(S), *Notice of Decision: Child Care*, to approve CCA through entry in KinderTrack system. Authorize a CCA payment after the provider has provided care and submits an attendance sheet to bill for the care.

For job readiness skills training participants who are required to repeat or make up a portion of schedule day due to absence, take the following actions:

- Authorize an additional transportation payment for any portion of job readiness skills training that the participant is required to repeat or make up due to an excused absence as described at [Problems With Participation](#) when the participant will have transportation costs that exceed the participant's original payment.
- Do not authorize additional transportation payments for any portion of job readiness skills training the participant is required to repeat or make up because of absence for reasons other than those that are described at [Problems With Participation](#).
- Authorize CCA for any portion of job readiness skills training the participant is required to repeat or make up due to an absence.

See [Supportive Payments: Transportation](#) and [Child Care Assistance](#) for more information on authorizing transportation and CCA.

Structured Job Search

Legal reference: 441 IAC 93.6(1)"c"

Policy: Structured job search is designed with scheduled activities and required hours of participation to reflect proven job-search techniques and the employment environment of the PROMISE JOBS service area.

Participants in structured job search appear daily at the PROMISE JOBS site to access resources for job leads. A PROMISE JOBS case manager is available to monitor the participant's progress in their job search and to provide assistance and support.

Structured job search provides up to 30 hours of scheduled activity per week and cannot exceed 30 hours per week.

PROMISE JOBS and the participant will develop a written job search plan using form 470-4481, *Job Search Plan Agreement* at the beginning of the structured job search period.

Participants who obtain employment averaging 30 hours or more per week may discontinue structured job search.

Participants who obtain employment averaging 20 hours per week or more but less than 30 hours per week may discontinue structured job search if part-time employment was the FIA goal or the scheduled structured job search hours conflict with the scheduled hours of employment. The participant may be required to participate in other FIA activities during the hours that do not conflict with work hours.

Participants who obtain employment averaging less than 20 hours per week shall continue the structured job search portion of job club unless the scheduled structured job search hours conflict with the scheduled hours of employment. The participant may be required to participate in other FIA activities during the hours that do not conflict with work hours.

Procedure: Structured job search may be provided as a group activity in an area with access to computers or laptops available for participants to use for on-line job readiness activities, searching for job openings, and for applying for jobs on-line.

Structured job search may be combined with job readiness skills training activities. See [Job Readiness Skills Training](#) for more information.

Expect structured job search participants to report to the PROMISE JOBS site on time for each scheduled day and to participate on a daily basis.

Provide a written notice when scheduling participants for structured job search that clearly provides the date(s), time(s), and address of the PROMISE JOBS site and allows the participant at least 10 calendar days to appear. See [Written Notice to Participant](#) for more information.

Help the participant complete form 470-4481, *Job Search Plan Agreement* on the first scheduled day of the structured job search period. Make expectations very clear to the participant regarding the activities and the number of job search contacts to be completed during the structured job search period.

The agreement should reflect the participant's particular needs and be as specific as possible regarding the methods for finding job openings and the expected number of hours to be committed to searching for work during the period of structured job search.

Consider each participant's individual situation and the amount of time and travel that will be needed for each job contact while assisting the participant with development of a job search plan. Require no more than 30 hours per week in structured job search. The 30 hours includes the time spent meeting at the PROMISE JOBS site.

Participants with problems or barriers to participation shall be expected to participate fewer hours to reach a level that is within their limitations.

Provide participants with all possible job lead resources, including access to IWD resource centers, phone books, daily newspapers, job listings that employers may provide to IWD, and any other available resources. As part of your structured job search design, you may require participants to contact employers by phone or email to schedule employment interviews.

Allow participants sufficient time away from the PROMISE JOBS site to complete in-person employment applications and participate in employment interviews. Encourage participants to inform other structured job search participants of potential job leads.

Use form 470-3099, *Job Search Record*, if needed to document job search contacts away from the PROMISE JOBS site, such as actual time spent finding job openings, making job contacts, and travel time from one job site to another. Assist the participant with completion of the record when needed.

If the participant is not scheduled to report back to the site for structured job search after completing job search activities away from the site, allow the participant **at least ten calendar days** from the last day of scheduled structured job search to provide the completed *Job Search Record*.

Review the completed *Job Search Record* and other documentation provided by the participant regularly. Consider the *Job Search Record* to be complete if the participant has completed the following information:

- Sufficient information to identify the employer that was contacted or the activity that was completed,
- The date the contact was made or the activity was completed,
- The amount of time spent on the contact or activity, and
- The participant's signature.

See [Required Verification and Documentation](#) for additional policies that apply.

Require structured job search participants to attend additional days of structured job search to make up absences that occur during the job search period.

- Do not add the required job searches from the days of absence to the total required from the participant.
- Do not require a participant to make up a portion of structured job search on another day of scheduled job search unless the makeup time, including time away from the PROMISE JOBS site, in addition to the previously scheduled time does not exceed 8 hours.

Document the actual time that the participant attended structured job search activities at the PROMISE JOBS site and actual time spent off-site in job search activities in the participant case file.

Report the actual hours of participation in structured job search through entry in the IowaWORKS system. Report any scheduled hours of structured job search missed for an excused reason as described at [Problems With Participation](#) and [Excused Absence and Holiday Hours](#).

Consider that a participant has chosen an LBP when the FIA includes structured job search as an activity and the participant fails to attend or satisfactorily participate as scheduled, does not complete or provide documentation of any job search activity completed off-site, or does not attend required make-up days. Apply policies at [Identifying Participation Issues](#), [Problems With Participation](#), and [Barriers to Participation](#).

Supportive Payments for Structured Job Search

Policy: Participants are eligible for a transportation supportive payment and Child Care Assistance (CCA) when needed to participate in structured job search.

Procedure: Use PJCase system to issue transportation payments before the start of structured job search. **Exception:** Contact IWD QA staff for instructions on how to proceed with participants who are not in PJCase due to not having a SSN.

Approve CCA before the start of the structured job search. Use form 470-4558 or 470-4558(S), *Notice of Decision: Child Care*, to approve CCA through entry in KinderTrack system. Authorize a CCA payment after the provider has provided care and submits an attendance sheet to bill for the care.

Include the amount of transportation payment that will be certain (i.e., travel from the participant's home to the PROMISE JOBS site) in the initial payment. If you find the participant will need additional transportation assistance at any time during the structure job search, issue the additional payment as soon as the need is determined.

For structured job search participants who are required to repeat or make up a portion of a schedule day due to absence, take the following actions:

- Authorize an additional transportation payment for any portion of structured job search that the participant is required to repeat or make up due to an excused absence as described at [Problems With Participation](#) when the participant will have transportation costs that exceed the participant's original payment.
- Do not authorize additional transportation payments for any portion of structured job search the participant is required to repeat or make up because of absence for reasons other than those that are described at [Problems With Participation](#).
- Authorize CCA for any portion of structured job search the participant is required to repeat or make up due to an absence.

See [Supportive Payments: Transportation](#) and [Child Care Assistance](#) for more information on authorizing transportation and CCA.

Individual Job Search

Legal reference: 441 IAC 93.6(2)

Policy: For the individual job search activity, participants are required to participate in activities directly related to finding a job, such as finding job openings and potential job contacts, making job contacts, and attending job interviews. The participant may conduct their job search activities on their own or with assistance from PROMISE JOBS and/or FaDSS, if enrolled.

Individual job search may also include job readiness activities that the participant participates in or attends in addition to activities directly related to finding a job. Assistance with these activities may be provided by PROMISE JOBS, other IWD staff, FaDSS (if enrolled), an employer, or other entity.

While individual job search can be used by any participant as an FIA activity, this activity is most appropriate for participants who have:

- Completed all available job readiness skills training and is now ready for work,
- Recent ties to the workforce and have the skills needed to successfully find a job,
- Successfully removed or reduced barriers to work,
- Recently completed training.

Participants shall be strongly encouraged to attend and complete all available job readiness skills training prior to selecting individual job search as an FIA activity. However, completion of all available job readiness skills training is not required prior to participating in an individual job search.

A participant may include individual job search in the FIA for up to 12 weeks or three calendar months. If after three consecutive months of individual job search, the participant still has not found employment, the case manager must review the situation for possible barriers to employment or possible need for training to increase employability. Individual job search may continue, if appropriate, but combining it with other activities should be considered.

A written job search plan is required for individual job search.

Procedure: Include individual job search in the FIA when you and the participant determine the option is appropriate. Renegotiate the FIA if needed. Follow the policies as described at [Written Notice to Participant](#) when scheduling a participant to renegotiate the FIA to include individual job search.

Encourage participants with individual job search in their FIA to participate in job readiness activities in addition to job search activities, such as but not limited to: attending lunch and learn sessions, working with IWD or FaDSS to improve interviewing skills, update their resume, locating job leads and conducting employment research, assessment for employability, soft skills development, helping the participant with conducting an on-line job search, identifying job accommodations, resume development, improving the participant's job search skills, coaching on networking, addressing criminal backgrounds, discussing appropriate work behaviors, grooming and work attire, budgeting, and self-esteem building.

Help the participant to develop a written individual job search plan on form 470-4481, *Job Search Plan Agreement* to make expectations clear to the participant. Be sure participants understand their responsibilities for individual job search by including the following in the plan:

- An explanation of the requirement to participate in job search activities and to complete and provide form 470-3099, *Job Search Record* and any supporting documentation.
- Specify the job search period and the required number of hours for each week in the period, and the due date(s) for completing and providing the completed *Job Search Record* for each week of the designated period.
- Specific methods for finding job openings and the types of job or employers to be focused upon.
- An explanation that failure to follow the job search plan may result in an LBP.
- Information to allow the accurate issuance of child care and transportation payments or to show that either of these supports is not needed.

The plan must be for a period of no more than five (5) weeks ending on Friday and falling within the same **calendar** month. Do not develop a job search plan that includes two weeks ending in a Friday that occur in different calendar months.

1. March has 4 Fridays: March 6, 13, 20, and 27.

A job search plan for March may include any or all of these weeks.

A job search plan for this month of March cannot include 5 weeks as there are not 5 weeks that end in Friday.

2. May has 5 Fridays: May 1, 8, 15, 22, and 29.

A job search plan for this month of May can include 5 weeks as there are 5 weeks that end in Friday.

The plan may also include days in April that occur in the week ending in May 1.

Include individual job search in the FIA for a period that does not exceed 12 weeks or three calendar months. If after three consecutive months of individual job search, the participant still has not found employment, review the situation for possible barriers to employment or possible need for training to increase employability. Individual job search may continue, if appropriate, but combining it with other activities should be considered. Renegotiate the FIA if needed.

Require participants to use form 470-3099, *Job Search Record*, to document actual time spent on job contacts as well as search activities, such as actual time spent researching area employment possibilities, finding specific job openings, and travel time from one job site to another job site. Participants who participate in job readiness activities, in addition to time in activities that are directly related to finding a job, need to report actual time spent in job readiness activities on the *Job Search Record* form.

Participants must provide a complete *Job Search Record* by the 10th calendar day following the end of the month during which the participant completed job searches. You and the participant may agree to a shorter period for providing the *Job Search Record*. For example, you and the participant may agree for the *Job Search Record* to be due in the week following a week during which the participant completed job searches. However, if the participant fails and the participant was not allowed until the 10th calendar day following the end of the month during which the participant completed job searches to provide the *Job Search Record*, the failure to provide verification does not count towards the choice of an LBP.

You may also choose to use form 470-4481, *Job Search Plan Agreement* to schedule an appointment at the end of a week of job search to give you and the participant an opportunity to discuss the *Job Search Record*, to provide help with completion of the record if needed, and to discuss future job searches. Schedule the first appointment no earlier than 10 calendar days from the date the participant is given or mailed the *Job Search Plan Agreement*.

See [examples](#) for examples of the *Job Search Plan Agreement* period, due dates for providing the *Job Search Record*, and for assigning an appointment date, if applicable.

Consider each participant's individual situation, job availability in the area, and the amount of time that will be needed for each job contact while assisting the participant with development of their job search plan. Require no more than 30 actual hours per week in individual job search. However, completing 30 hours a week of job search can be very challenging, if not impossible, especially in rural areas. Consider combining individual job search with other FIA activities to reach full time equivalency.

When individual job search is combined with another activity, consider the hours that will be required for the other activity when determining the required hours for individual job search. Participants with problems or barriers to participation shall be expected to participate fewer hours to reach a level that is within their limitations. See [examples](#).

The discussion between you and the participant to develop the plan may occur in person or over the phone. Give or send the original of each individual job search plan to the participant. When sending the agreement to the participant, ask the participant to sign the agreement and return it within 10 calendar days. Keep a copy for the participant case file.

If after three consecutive calendar months of participating in individual job search the participant is still not employed, review the situation and determine if:

- Barriers are interfering
- Skills in job search activities need to be updated
- Further training is needed to help make the participant more employable

Individual job search may continue after three consecutive months, if appropriate. Consider combining individual job search with other activities. Renegotiate the participant's FIA if needed.

Participants must clearly report their job search contacts and other job search activities on the *Job Search Record*, form 470-3099. Consider the participant to have met the documentation requirement if the participant has completed the following information on the *Job Search Record*:

- Sufficient information to identify the employer that was contacted or the activity that was completed,

- The date the contact was made or the activity was completed,
- The amount of time spent on the contact or activity, and
- The participant's signature.

When a participant with individual job search in their FIA also participates in a job readiness activity on their own or with assistance from IWD, FaDSS, or another agency, the participant may report the actual hours spent in job readiness activities on the *Job Search Record* form, in addition to their job search hours.

Encourage participants to complete all sections of the form. Provide assistance with completion of the form when necessary. Do not consider a participant's failure to fully complete a *Job Search Record* as a failure that counts towards the choice of an LBP when information other than that specified above is lacking.

Contact the participant for more information if a *Job Search Record* form is complete as defined yet information that you need regarding their activities is missing or questionable.

When an area employer has more than one location, the participant must provide the employer's complete address or phone number for the form to be considered complete.

Review the completed *Job Search Record* and other documentation provided by an individual job search participant upon receipt to determine if the time reported by the participant is consistent with the type of contact (interview, phone contact, completing an application, sending a resume, etc.) or other job search activity, including the reported travel time between job sites.

Verify at least two reported job contacts per week. Use your judgment to determine if additional contacts need to be verified. If the participant is required to make only one contact, verify that contact.

Report actual time spent finding job openings, making job contacts, travel time between job sites, and meeting with PROMISE JOBS to discuss and complete the *Job Search Record* or to develop the job search plan as hours of participation through entry in the IowaWORKS system. Report any **scheduled** hours of individual job search missed for an excused reason as described at [Problems With Participation](#) and [Excused Absence and Holiday Hours](#). Scheduled hours include a scheduled job interview or a scheduled appointment to discuss or complete the *Job Search Record* or to develop a job search plan.

Consider that participants have chosen the LBP when they do not complete the steps of the written individual job search plan:

- When a participant fails to provide the *Job Search Record* according to the plan, follow policies at [FIA Participation Issues](#).
- When a participant fails to appear for or participate in job search activities as stated in the *Job Search Plan Agreement*, follow policies at [FIA Participation Issues](#).

Comment: Examples for determining job search plan period and the due date for the *Job Search Record* and for using individual job search as an FIA activity:

March has 4 Fridays: 6, 13, 20, and 27.

- A job search plan for March may include any or all of these weeks.
- A job search plan for March cannot include 5 weeks as there are not 5 weeks that end in Friday.
- The Job Search Plan is developed on Tuesday, February 17. Assign due dates for the Job Search Record and appointment dates (if applicable) as follows:

Job Search Week Ending:	Job Search Record Due Date:	Appointment Date:
March 6	April 10	March 6
March 13	April 10	March 13
March 20	April 10	March 20
March 27	April 10	March 27

May has 5 Fridays: May 1, 8, 15, 22, and 29.

- A job search plan for May can include 5 weeks as there are 5 weeks that end in Friday.
- The plan may also include days in April that occur in the week ending on May 1.
- The Job Search Plan is developed on Tuesday, April 14. Memorial Day is May 25. Assign due dates for the Job Search Record and appointment dates (if applicable) as follows:

Job Search Week Ending:	Job Search Record Due Date:	Appointment Date:
May 1	June 10	May 1
May 8	June 10	May 8
May 15	June 10	May 15
May 22	June 10	May 22
May 29	June 10	May 22

1. Ms. A has a varied job history. She wants flexibility to look for work in several occupational areas. On September 23, Ms. A and her PROMISE JOBS worker decide that Ms. A will use individual job search plans that are one week in length and write the Job Search Plan Agreement. Ms. A plans to turn in her *Job Search Record* during a weekly appointment with the worker. During the office visit, they design the new plan for the week ending on Friday, October 10.

In her FIA, she indicates that she will use individual job search for the months of October and November. If she has not found employment in two months, she and the worker agree that Ms. A should use the work experience component.

Ms. A and PROMISE JOBS write the first week's job search plan as follows:

Job Search Week Ending:	<i>Job Search</i> Record Due Date:	Appointment Date:
October 10	October 17	October 17

Ms. A appears for her October 17 appointment and has not completed her *Job Search Record* for the week ending October 17. PROMISE JOBS assists her so that she is able to turn the record in and they write the plan for the following week.

2. Ms. B is an experienced food service worker. She lives in a rural area and must travel to other communities to look for work in that industry. The FIA for Ms. B indicates that she will use individual job search for the months of May, June, and July. Because of the distances involved, she believes it may take her all three months to find employment.

The FIA also indicates her agreement with her PROMISE JOBS worker to use individual job search plans that are two weeks in length. Ms. B and her PROMISE JOBS worker design a plan for the next two-week period ending with Fridays, allowing 10-day notice. If she has not reported employment at the end of a two-week plan, Ms. B and PROMISE JOBS will design the plan for the next two-week period over the phone.

On April 20, Ms. B and PROMISE JOBS write the current plan as follows:

Job Search Week Ending:	<i>Job Search</i> Record Due Date:	Appointment Date:
May 7	May 14	N/A
May 14	May 21	May 21 by phone

3. Ms. C is completing her bachelor's degree in May and will have a teaching certificate. She and her worker renegotiate and amend her FIA to include the details for individual job search.

Ms. C and the worker develop the FIA to allow for individual job search in June, July, and August. The FIA also indicates that each job search plan will be written for a calendar month.

The June plan includes the weeks in June that end in a Friday and specifies Ms. C's plans to use newspaper advertising, recruitment agencies, college placement services, etc. to locate teaching positions. It will include her plan to develop a resume, arrange for availability of transcripts, etc. Anticipated child care and transportation needs will be included in the plan.

If plans for the second and third months are needed, Ms. C and her worker will meet to decide on the content at that time. On May 17, Ms. C and PROMISE JOBS write June's plan as follows:

Job Search Week Ending:	Job Search Record Due Date:	Appointment Date:
June 3	July 10	N/A
June 10	July 10	N/A
June 17	July 10	June 24 (to develop July's plan that will begin on June 27 for week ending July 1)
June 24	July 10	N/A

4. Mr. L is a young man who wants to start working as soon as possible, but has little employment history and no high school diploma. He and his worker develop the FIA to include both individual job search activities as well as working on obtaining his HSED. He will be attending HSED classes Monday, Wednesday and Friday for 6 hours per day and will search for a job for 6 hours per day on Tuesday and Thursday.

His FIA allows for individual job search in January and February. The FIA also indicates that each job search plan will be written for a calendar month at a time. If at the end of the two months, Mr. L has not found a job, he and his worker will review Mr. L's situation and determine if job search should continue or if it would be more beneficial for him to participate in another activity such as work experience or unpaid community service. On December 27, Mr. L and PROMISE JOBS write January's Job Search Plan agreement as follows:

Job Search Week Ending:	Job Search Record Due Date:	Appointment Date:
January 6	February 10	N/A
January 13	February 10	N/A
January 20	February 10	January 20 (to develop February's plan that will begin on January 30 for week ending February 3)
January 27	February 10	N/A

Individual Job Search Supportive Payments

Legal reference: 441 IAC 93.6(2)

Policy: Participants are eligible for a transportation supportive payment and Child Care Assistance (CCA) when needed to participate individual job search.

Procedure: Use PJCase system to issue transportation payments to participants prior to the start of in individual job search. **EXCEPTION:** Contact IWD QA staff for instructions on how to proceed with participants who are not in PJCase due to not having an SSN.

Approve CCA before the start of the individual job search. Use form 470-4558 or 470-4558(S), *Notice of Decision: Child Care*, to approve CCA through entry in KinderTrack system. Authorize a CCA payment after the provider has provided care and submits an attendance sheet to bill for the care.

Proceed as follows when FIP is approved for a participant who has a pending CCA application for job search if the participant has not been approved for CCA for job search through HHS in the last 12 months:

- Approve CCA as of the date of the CCA/FIP application or first day of need if the participant has been using child care to make job search contacts, whichever is later.

- Approve CCA as of the first day of individual job search if the participant has chosen to wait until FIP approval to begin job search through PROMISE JOBS.

See [Supportive Payments: Transportation](#) and [Child Care Assistance](#) for more information on authorizing transportation and CCA.

Supportive Payments for Unplanned Job Opportunities

Legal reference: 441 IAC 93.6(3)

Policy: PROMISE JOBS participants who are ready for employment need to be encouraged to take advantage of any unplanned opportunity to apply for a job, even if job search or work activities are not written in the FIA as the current activity.

Child Care Assistance (CCA) and transportation payments are available to PROMISE JOBS participants if needed to make an unplanned job contact if the following criteria are met:

- The participant has signed an FIA and is approved to receive FIP benefits for their own needs or for the needs of a child in the home. The unplanned job contact does **not** need to be specified in the FIA.
- The participant is willing to provide documentation of the unplanned job search contact on form 470-3099, *Job Search Record*.
- The contact must be an in-person contact to complete an application or to attend an interview.

Procedure: When a participant contacts you to request child care or transportation assistance to make an unplanned job contact, obtain sufficient information from the participant to determine the amount of needed transportation and the number of needed child care units.

When child care is needed, ask the participant about their child care arrangements. Provide information and referrals to help the participant select an approvable child care provider if needed.

Follow-up by sending a written explanation that transportation will not be paid if the participant does not complete the contact or does not complete and return form 470-3099, *Job Search Record* form to document the job contact. Include a blank *Job Search Record* and return envelope. Approve Child Care Assistance (CCA) needed to make the job contact. If the participant is currently approved for CCA, approve any additional CCA units needed to make the contact.

If a participant contacts you to request child care or transportation payments **after** making an unplanned job contact, you may provide child care and transportation assistance if the participant meets the previously stated requirements. Send a written explanation that transportation will not be paid if the participant does not complete the contact or does not provide a completed form 470-3099, *Job Search Record* form to document the job contact. Include a blank *Job Search Record* and return envelope. For CCA, also explain that child care needed to make the contact will not be paid if the participant does not complete the job contact or does not provide a completed *Job Search Record*.

When a participant is requesting assistance for an ongoing job search rather than an unplanned job contact, the participant should be assigned to structured job search or the individual job search, depending on which level of job search service is needed. Schedule an appointment to discuss renegotiation of the FIA.

If a participant contacts you to request a child care or transportation payment to make an unplanned job search contact, and you find that the participant did not make the contact, do not consider this a potential choice of an LBP unless job search activities are included in the FIA as the current activity.

Review the completed *Job Search Record* of the unplanned job contact upon receipt. Verify the contact or the reported time if questionable.

Report actual hours spent in an unplanned job contact through entry in the IowaWORKS system. If a participant is absent from a scheduled activity other than employment due to an unplanned job opportunity report the missed hours as an excused absence as described at [Problems With Participation](#) and [Excused Absence and Holiday Hours](#).

Use PJCase system to issue a transportation payment based on the information verbally provided by the participant and on the *Job Search Record*. **Exception:** Contact IWD QA staff for instructions on how to proceed with participants who are not in PJCase due to not having an SSN. See [Transportation](#) for the additional policies regarding transportation payments.

If a participant requests transportation for an unplanned job contact and fails to provide a completed *Job Search Record* to document the contact, do not authorize a transportation payment. No further action is required for transportation.

Approve Child Care Assistance (CCA) needed to complete the job contact by issuing form 470-4558 or 470-4558(S), *Notice of Decision: Child Care*, through entry in KinderTrack system. If the participant is currently approved for CCA, authorize any additional units needed to make the job contact.

For child care:

- If the participant requested CCA prior to making the job contact, authorize a child care payment when the provider submits an attendance sheet to bill for the care.

In this situation, establish an overpayment for the participant for any CCA units paid for an unplanned job contact if the participant does not document the job contact with a *Job Search Record* or did not make the contact.

- If CCA was approved for a period that is after the day that the participant made the job search contact because the client did not request CCA until after making the contact and the participant does **not** provide a *Job Search Record* or make the contact, reject payment for any CCA units billed to cover time spent on the job contact unless the participant was otherwise eligible for the CCA unit.

Mental Health, Substance Abuse, and Other Rehabilitative Treatment

Legal reference: 441 IAC 93.6(5)

Policy: The need for the treatment or rehabilitative activities and a referred person's ability to participate in work or other PROMISE JOBS activities must be determined by a qualified medical, substance abuse, or mental health professional. The time spent in treatment or rehabilitative activities may be included in a referred person's FIA if a qualified professional documents that the treatment or rehabilitative activities are needed for the person to obtain or retain employment.

The existence of substance abuse, mental health, and physical health issues does not necessarily inhibit a person's ability to work or participate in PROMISE JOBS activities. Each person's individual situation should be reviewed according to the extent that the issue affects the person's ability to participate in work or other PROMISE JOBS activities and [Barriers to Participation](#). A diagnosis, in and of itself, is not a reason for not participating.

Some conditions may have little or moderate effect that can be addressed through a treatment plan, accommodations at the work site, or both. Other conditions may be severe enough to limit or prevent the person's ability to work or participate in other PROMISE JOBS activities.

Procedure: When a referred person reveals substance abuse, mental health, or physical health issues that are affecting the family's ability to participate in PROMISE JOBS activities and the person needs treatment, the treatment plan can be included in the FIA when a qualified medical, substance abuse, or mental health professional verifies the need and the referred person agrees to include the plan in their FIA.

If the referred person has been assessed by a qualified medical, substance abuse, or mental health professional, require the person to provide verification. Complete a short-term FIA if the referred person is present or send a written request that requires the referred person to:

- Provide verification of the results of the assessment **or** to contact PROMISE JOBS if the referred person decides that the issue will not interfere with the person's ability to participate in FIA activities on a full-time basis, and,
- Attend another appointment with the PROMISE JOBS worker on the day that the verification is due to discuss the results of the assessment and renegotiation of the FIA. Specify the appointment date and time in the FIA or written notification.

Issue form 470-0447, *Report on Incapacity* to assist the referred person with obtaining the verification and allow the person ten calendar days to provide the completed form. Include all of the requirements for a written request as specified at Written Notification in the FIA or the written request.

If the referred person has not been assessed by a qualified medical, substance abuse, or mental health professional, complete a short-term FIA if the person is present or send a written request that requires the person to schedule an assessment with a qualified medical, substance abuse, or mental health professional and to contact you with the appointment time and date. Allow the participant **at least ten calendar days** from the date the FIA is signed or written request is mailed to:

- Contact you with the appointment time and date **or**
- Contact you if the referred person decides that the issue will not interfere with the person's ability to participate in FIA activities on a full-time basis.

If the referred person contacts you with the appointment time of a scheduled assessment, issue form 470-0447, *Report on Incapacity* to assist the referred person with obtaining the verification. Include all of the requirements for a written request as specified at Written Notification in the written request. Allow the person ten calendar days from the date of the request to provide the completed form.

If the verification reveals that an issue exists and treatment or rehabilitation is needed, include the treatment plan in the FIA. If appropriate, you may combine the treatment plan with other activities. Consider the medical verification and other family circumstances when determining the level of participation.

If the verification does not reveal that an issue exists or the referred person decides that the issue will not interfere with participation in PROMISE JOBS activities, negotiate the agreement to include participation in other activities.

Renegotiate the FIA to include a new treatment plan or a change in an existing treatment plan if the participant wants the treatment considered as an FIA activity. Once included in the FIA, compliance with a treatment plan is subject to LBP rules. Follow policy at [FIA Participation Issues](#) when determining if the participant has chosen an LBP.

Require the participant to use form 470-2617, *Time and Attendance* to document hours of participation in assessment for a substance abuse, mental health, or physical health issue and in treatment activities. See [Required Verification and Documentation](#) for more information.

Report actual hours of participation spent in a treatment activity included in the FIA through entry in the IowaWORKS system. Report any scheduled hours of a treatment activity missed for an excused reason or holiday as described at [Excused Absence and Holiday Hours](#).

Provide Child Care Assistance (CCA) and a transportation payment when needed for participation in assessment and treatment activities included in the FIA:

- Authorize a transportation payment if needed for participation.
- Approve Child Care Assistance (CCA) if needed for participation.

Issue the transportation payment so that the participant receives the payment before the need to attend assessment or treatment activities. Issue transportation supportive payments through entry in PJCase system. **EXCEPTION:** Contact IWD QA staff for instructions on how to proceed with participants who are not in PJCase due to not having an SSN.

Work Options

Legal reference: 441 IAC 93.7(239B)

Policy: Work options are designed to build the participant's work skills and experience. They are flexible so they can be combined together or combined with other FIA activities depending on the participant's work history, skill level, and life circumstances.

Work options include:

- Paid activities:
 - Employment which includes full-time and part-time employment, as well as, subsidized and self-employment.
 - On-the-job training (OJT)

- Unpaid activities:
 - Work experience placement (WEP)
 - Unpaid community service (UCS)

Procedure: When you meet with the participant to develop their FIA, discuss the different options available. In choosing suitable work options take into account the following:

- Previous work and training history
- Current skills and education levels
- Life circumstances of the participant including identification of possible barriers
- Life goals and interests

Due to Department of Labor standards, participants might not be able to participate full-time in either work experience or community service. See [Work Experience Placement](#) and [Unpaid Community Service](#) for more information.

You can combine these activities with other FIA activities to reach full-time equivalency. For example, pairing work experience with part-time education or training. You may also encourage participants to combine several work options. For example, you may combine a part-time job with some hours in unpaid community service.

The following sections give more information regarding each work option, including available supportive payments:

- [Employment](#)
- [Work experience placement \(WEP\)](#)
- [Unpaid Community Service](#)
- [WEP and UCS Participation Requirements](#)
- [Refusing, Ending, or Reducing Employment](#)
- [Defining misconduct](#)

Employment

Legal reference: 441 IAC 93.7(1)

Policy: Employment that will lead to economic self-sufficiency is the eventual goal of the FIA. Employment may be the principal activity of the FIA or combined with other FIA activities when appropriate for the family's specific needs and circumstances.

Employment that does not lead to economic self-sufficiency may be included in the FIA only if the employment situation leads to better employment opportunities through building work skills and work history.

Procedure: Verify actual hours of employment as described at [Verifying and Projecting Employment Hours](#).

Regularly monitor an employed participant's progress to ensure that the participant is demonstrating effort and truly carrying out the steps of the FIA with regard to employment and that the employment is leading to economic self-sufficiency. Review a participant's progress in employment when the participant reports a change and at least once every six months.

If the job is not providing the participant with high enough wages or enough hours for the participant to be economically self-sufficient, review the situation with the participant. Determine if the current job is positioning them for better employment and should be retained or the FIA needs to be renegotiated to include other activities to build the participant's skills.

Situations where minimal employment is appropriate as an FIA activity:

- The participant has little work history or a poor work history and maintaining a job successfully over a period of time will help them in obtaining better employment.
- With the experience gained in this job, the participant will be better positioned to apply for a higher position either within the same company or organization or in a different company or organization within the same field.
- The participant has barriers that need to be resolved or managed before increasing hours or increasing complexity or stress of the job.
- The participant is combining employment with other skill building FIA options, thereby positioning themselves for a better job.

Examples of appropriate use of minimal employment:

1. Mr. D is working for a trucking company part-time. There are full-time positions periodically available for which Mr. D would like to apply. By working the part-time job successfully, Mr. D will have a better chance of gaining the full-time position (either within that company or the other trucking company in town).
2. Ms. A is working two hours a day several days a week at the public library. She is receiving treatment at the mental health center for depression. The therapist recommends maintaining that minimal schedule for the time being.
3. Ms. C is working weekends at a local convenience store for minimum wage. She is attending classes at the community college during the week. Once her classes are completed she will be able to apply for a full-time job as a paralegal.
4. Ms. R has been fired from her past two jobs for not following directions. Her current employer is willing to work with her to overcome this problem. Though this job does not pay enough to support her, it is likely to give her a successful job experience thus setting her up for better positions in the future.

Full-Time Employment

Legal reference: 441 IAC 93.7(1)

Policy: Full-time employment is the eventual goal for all participants. Full-time employment is defined as employed an average of 30 or more hours per week.

A person who is employed full-time is considered to be meeting their FIA obligations if the employment will lead to better employment opportunities through building work skills and work history.

Procedure: When a participant is employed full-time, the employment may be the only FIA activity until the FIA end date is reached. If the end date is reached and the person remains eligible for FIP, renegotiate the FIA to extend the end date.

Establish reasonable and realistic FIA end dates by considering the participant's opportunity for an increase in wages, a promotion, or finding a different job that is more likely to lead to self-sufficiency. Consider the availability of jobs in your area when making this determination.

Verify and report actual projected employment hours in IowaWORKS as described at [Verifying and Projecting Employment Hours](#).

Regularly monitor progress as previously described in [Employment](#).

Refer to [Employment Supportive Payments](#) for information regarding participant eligibility for supportive payments while employed.

Refer to the following to determine if the participant is choosing an LBP:

Part-Time Employment

Legal reference: 441 IAC 93.7(1)

Policy: Part-time employment is defined as employed an average of less than 30 hours per week.

A participant who is employed an average of less than 30 hours per week can continue employment at that level when:

- The employment will lead to better employment opportunities through building work skills and work history, or
- The employment has advancement opportunities.

An FIA that includes part-time employment shall also include participation in other activities, including additional part-time employment, unless problems or barriers to participation exist.

Part-time employment may be appropriate due to individual and family circumstances.

Procedure: For some participants, part-time employment will be their only activity, at least for a while. This may be appropriate for participants with problems, barriers, or other circumstances that prevent participation on a full-time basis or for participants who are also involved in other FIA activities.

You may also write the FIA to include part-time employment in combination with participation in other PROMISE JOBS activities.

Though employment is the eventual goal for all participants, it is acceptable for participants to leave part-time employment to move into another FIA activity if that activity will increase the participant's probability of obtaining employment that will move them to economic self-sufficiency. See Employment for situations when minimal employment is acceptable as an FIA activity.

Verify and report actual projected employment hours in IowaWORKS as described at [Verifying and Projecting Employment Hours](#).

Regularly monitor progress as described in Employment.

Refer to [Employment Supportive Payments](#) for information regarding participant eligibility for supportive payments while employed.

Refer to the following to determine if the participant is choosing an LBP:

Self-Employment

Legal reference: 441 IAC 93.7(2)

Policy: It is appropriate for a participant to have self-employment as the only FIA activity when the participant's calculated hours of participation in self-employment equates to:

- An average of 30 hours per week (full-time), or
- Less than an average of 30 hours per week (part-time) and the participant is making satisfactory progress and demonstrating incremental increases in income and calculated hours.

Except as stated in this section, participants who are self-employed must meet the same policies and procedures as other full-time and part-time employed people. See [Full-Time Employment](#) and [Part-Time Employment](#) for information.

Procedure: To include self-employment in a participant's FIA, self-employed participants must provide PROMISE JOBS with verification of gross earnings and expenses received in the last 30 days:

- Request verification at the time the participant reports starting self-employment or
- If they are self-employed when entering PROMISE JOBS, request the verification when writing the FIA with a specific due date.

The participant may provide documentation for a period greater than 30 days when the last 30 days is not a good indicator of normal businesses and expenses.

Inform the participant in writing of the requirement to verify self-employment gross income and expenses as described at [Written Notice to Participant](#).

PROMISE JOBS must re-verify gross earnings and expenses:

- When the participant reports a change, or
- At least once every six months.

Hours of participation for a self-employed person are systemically calculated by using:

- Net income (gross income less business expenses) as entered by the IM worker in ABC and
- Divided by the federal minimum wage.

View the calculated hours in the participant's PJCase Person screen. See Comment for more information.

Use the verification of earnings and expenses along with the calculated hours in PJCase to determine if the self-employed participant is making satisfactory progress towards full-time employment and the goal of self-sufficiency.

You may also consider the actual hours worked in self-employment in the last 30 days as reported by the participant. The calculated hours of participation may not have increased, but the participant may be achieving that calculation in fewer hours of actual work.

For example, when the participant started the business the participant was working 80 hours a week to get to the calculated hours of 25 hours a week.

At the time of the review, though the participant calculated hours remain at 25 hours a week, their actual hours of work have dropped to 40 hours a week.

The participant's gross earnings have also increased. Both may be used as an indicator of improvement.

If, when reviewing this information, improvement is not determined, consider adding other FIA activities to bring participation up to a full-time level, unless the participant:

- Has been self-employed for 12 months or less, or
- Has problems or barriers that prevent participation at a full-time level.

Refer to [Employment Supportive Payments](#) for information regarding participant eligibility for supportive payments while employed.

Participants who fail to maintain self-employment as stated in their FIA are considered to have chosen an LBP unless good cause exists as described at [Problems With Participation](#) and [Barriers to Participation](#). When participation in self-employment becomes an issue, attempt to resolve the issue as described at [FIA Participation Issues](#).

Subsidized Employment

Legal reference: 441 IAC 93.7(1)

Policy: Subsidized employment is paid employment in the public or private sector. The employer receives a subsidy from public funds to offset some or all of the wages or other costs of employment. Public funds come from federal, state, or local government, including state universities and community colleges.

The desired goal of subsidized employment is that it will lead to regular unsubsidized employment:

- The participant moves into regular unsubsidized employment with the same employer, or
- The participant uses the experience to find regular unsubsidized employment elsewhere.

PROMISE JOBS funding cannot be used to subsidize employment.

Procedure: Examples of subsidized employment include:

- Internships,
- Work-study,
- Sheltered workshops, and
- Other supported work programs that are subsidized by an educational institution or other public funds.

Subsidized employment can be full-time, part-time, or self-employment. See the appropriate sections for the procedures.

See [On-the-Job Training](#) for the distinction between subsidized employment and on-the-job training.

Verify and report actual projected subsidized employment hours in IowaWORKS as described at [Verifying and Projecting Employment Hours](#).

Regularly monitor progress as described in Employment.

Refer to [Employment Supportive Payments](#) for information regarding participant eligibility for supportive payments while employed.

Refer to the following to determine if the participant is choosing an LBP:

On-the-Job Training

Legal reference: 441 IAC 93.7(3)

Policy: On-the-job training (OJT) means training in the public or private sector that is given to a paid employee while the employee is engaged in productive work. The training provides knowledge and skills essential to the full and adequate performance of the job. The employer is subsidized to offset the cost of this training.

The desired goal of OJT is for the participant to find permanent employment at the end of the training:

- The employer that provided the training hires the participant at the end of the training, or
- The participant uses the training and experience to find employment elsewhere.

OJT is distinguished from subsidized employment in that with OJT, the participant receives training while engaged in work and the employer is subsidized to offset the cost of the training. Under “subsidized employment,” the employer is subsidized for the costs of employing the person such as wages, benefits, or the additional cost of employment-related taxes.

PROMISE JOBS funding cannot be used to subsidize on-the-job training.

Procedure: For purposes of verification and documentation, OJT is considered “employment.” This includes the capability to project hours. Verify actual hours of on-the-job training as described at [Verifying and Projecting Employment Hours](#).

When verifying hours of participation for OJT you can also accept verification of hours from another public agency if the agency is subsidizing or sponsoring the arrangement and the agency supervises hours of participation.

EXAMPLE: If Iowa Vocational Rehabilitation Services (IVRS) is providing OJT within a local business and is providing the subsidy, IVRS can provide the verification of hours.

Participants who without good cause do not participate in OJT as specified in their FIA are considered to have chosen an LBP. Attempt to resolve the issue as described at [Refusing, Ending, or Reducing Employment](#) and [FIA Participation Issues](#).

Employment Supportive Payments

Legal reference: 441 IAC 93.7(1)

Policy: “Employment” for this section applies to participants in full-time, part-time, and subsidized employment, self-employment, and on-the-job training.

Employed participants are not eligible for transportation supportive payments for their transportation costs needed to get to their “employment” activities. Transportation costs for employed participants are covered by the FIP earned income disregard.

Employed participants are eligible for Child Care Assistance (CCA) when needed to participate in employment.

Procedure: Approve CCA needed for employment activities. Use form 470-4558 or 470-4558(S), *Notice of Decision: Child Care*, to approve CCA through entry in KinderTrack system. Authorize a CCA payment after the provider has provided care and submits an attendance sheet to bill for the care.

See [Child Care](#) and [13-G, Child Care Assistance](#) for full policies regarding child care payments.

Work Experience Placement (WEP)

Legal reference: 441 IAC 93.7(4)

Policy: Work experience placement (WEP) provides unpaid work experience in a real employment setting for the participant to learn general skills, knowledge, and work habits necessary to find and keep employment. A WEP can be used to improve the employability of a participant with little or no work experience, and to renew or create ties between them and the business community.

Local businesses interview participants for a position in their company. If the participant is accepted by a business, they will report to the worksite per an agreed upon schedule. The business will provide the supervision of the participant and report their progress on a monthly basis to the PROMISE JOBS worker.

Each work experience assignment is not more than six months in duration.

For the difference between WEP and Unpaid Community Service, see [Unpaid Community Service](#).

Procedure: Use WEP for participants who need specific job skills or experience in the work environment to improve their employability. A WEP can also be used to:

- Renew or create ties to a specific business community or occupation,
- Try out a specific industry or trade prior to pursuing full-time employment in that area, or
- Invest in training needed for that industry.

Due to Department of Labor standards, most participants will not be able to participate full-time in work experience. Participants may combine a WEP assignment with participation in other FIA activities when appropriate for individual circumstances. See [WEP and UCS Participation Requirements and Limits](#) for more information.

EXAMPLE: Combine WEP with part-time education or training, or some hours of individual job search.

The following sections provide more information regarding WEP policy and explain procedures:

- [Appropriate Work Sites and Positions](#)
- [Using WEP as an FIA Activity](#)
- [Maximum Length of Assignment](#)
- [WEP Participant Evaluations](#)
- [Work Site Safety and Workers' Compensation](#)
- [Supportive Payments for WEP](#)

Appropriate Work Sites and Positions

Legal reference: 441 IAC 93.7(4) “a” and “b”

Policy: Suitable work sites include public and private employers, non-profit agencies, community and faith-based organizations.

Work sites must agree to use the same job description and performance requirements that exist for paid employees in the same position. They must provide PROMISE JOBS with monthly evaluations of the participant’s job performance.

WEP positions must also meet the following criteria:

- Positions shall not be related to political, electoral, or partisan activities.
- Positions shall not be developed in response to or in any way associated with the existence of a strike, lockout, or other bona fide labor dispute.
- Positions shall not violate any existing labor agreement between employees and employer.
- Positions shall comply with applicable state and federal health and safety standards.
- Positions shall not be used to displace current employees or to infringe on their promotional opportunities.
- Positions shall not be used in place of hiring staff for established vacant positions, and shall not result in placement of a participant in a position when any other person is on layoff from the same or equivalent position in the same unit.
- Work sites cannot discriminate against any program participant because of race, creed, color, religion, sex, national origin, age, physical or mental disability, sexual orientation, or gender identity.
- Work sites within faith-based organizations may be used only when work performed is nonsectarian and not in support of sectarian activities. Work sites may not use participants to replace regular employees in the performance of nonsectarian work to enable regular employees to engage in sectarian activities.

Procedure: Develop professional relationships with potential WEP sites in your area. Inform potential sites about the PROMISE JOBS program, the existence of WEP, and the availability of PROMISE JOBS participants.

Employers who participate in the WEP program are referred to as “sponsors.” Expect sponsors who request WEP participant placements to:

- Complete form 470-0809, *Sponsor’s Request for WEP Placement*, for each type of position that they wish to fill.
- Include a complete job description specifying all tasks to be performed by the participant.

You have final authority to determine suitability of any WEP position offered by a sponsor.

Using WEP as an FIA Activity

Legal reference: 441 IAC 93.7(4)"c"

Policy: When WEP is the current FIA activity, determine an appropriate worksite. Match participant vocational skills and interests as closely as possible with the job description and skills requirements specified by the sponsor. The willingness of the participant and the satisfaction that a sponsor has with a WEP placement are dependent on this match. Consider that the outcome of the placement may influence a sponsor's willingness to accept future WEPs.

Procedure: Participants should have adequate job-seeking skills, and interviewing skills, as well as basic ability to conform to workplace rules, expectations and values prior to a WEP assignment. You may choose to have participants, who do not yet have these skills, attend Work Readiness workshops before participating in a WEP.

WEP needs to be included as a current FIA activity prior to scheduling a WEP interview for the participant. Schedule the participant to discuss the requirements of WEP or to discuss renegotiation of the FIA if needed. See [Renegotiation and Amendment of the FIA](#) for more information.

Develop a participant profile using information gained during assessment, including interview and test results, to identify the types of work that a participant is most suited to perform and interested in. Refer participants only to those positions with job descriptions and skill requirements that match their skills and interests.

Refer a participant for WEP as follows:

- Determine the monthly number of hours the participant will be required to participate in WEP as described at [WEP and UCS Participation Requirements and Limits](#).
- Select the WEP site.
- Schedule the WEP interview with the sponsor.
- Complete the referral portion of form 470-0810, *Referral for Work Experience (WEP) Placement*, and enter the expected monthly hours of participation.
- Give or mail the referral form to the participant. Include documentation that describes the LBP.
- The sponsor completes the form and returns it to you, indicating if the sponsor has accepted the participant.

Notify the participant in writing of a WEP interview as described at [Written Notice to Participant](#). Allow the participant at least 10 calendar days from the date the notice is mailed or given to the participant to appear for a WEP interview unless the participant agrees in writing to a shorter time frame.

NOTE: Failure to comply with a time period shorter than 10 calendar days does not count as a failure that will lead to an LBP.

If the sponsor accepts the participant:

- Expect the sponsor to verify the participant's actual hours of participation for each month on *Time and Attendance*, form 470-2617.
- Require the participant to provide the attendance form by the 10th calendar day of the following month, unless the sponsor returns the form.
- Notify the participant in writing of the requirement to verify WEP hours by including the specific expectation in the FIA.

If the participant and sponsor are a good match, you should expect the sponsor to accept the participants you refer to them for placement. However, sponsors may refuse any referrals they deem inappropriate for the position that they have available. Ask sponsors who refuse a referral to notify you in writing of the reason for the refusal.

Once you have verified actual hours of participation in WEP, report the monthly actual hours of participation through entry in IowaWORKS. Report scheduled WEP hours missed for an excused reason when allowable as described at [Excused Absence and Holiday Hours](#).

When participation in WEP becomes an issue, refer to [FIA Participation Issues](#), determine if the participant is choosing an LBP, and to attempt to resolve the issue.

Maximum Length of Assignment

Legal reference: 441 IAC 93.7(4)"d"(3)

Policy: Six months is the maximum duration for each WEP assignment.

Procedure: The limit of six months for each WEP assignment ensures reevaluation of the arrangements. Participants who complete a six-month WEP assignment are eligible for any of the following options, whichever is appropriate under the FIA:

- The participant may move to another FIA option as provided in the steps of the FIA.
- The participant may be assigned to a different WEP worksite.
- The participant may be reassigned to the same WEP worksite.

The same worksite may be used beyond the six-month assignment when the participant:

- Still has more to learn within the same position, or
- Will move to a different position within the same site.

When you and the WEP participant believe that the participant has gained sufficient work experience before completing the planned number of months of the WEP assignment, the participant should move to another activity to facilitate regular employment. The sponsor should have input in this decision.

WEP Participant Evaluation

Legal reference: 441 IAC 93.7(4) “e”

Policy: In addition to verifying the participant’s hours of participation, expect WEP sponsors to evaluate a participant’s work performance monthly.

Procedure: Expect sponsors to complete a monthly evaluation of the participant’s performance using form 470-0805, *Work Experience Participant Evaluation*, and provide copies to the participant and to you.

This monthly evaluation report will enable you to monitor participant performance and provide the participant with necessary feedback regarding job performance.

If problems are identified, meet with either the participant, the sponsor or both parties to resolve any issues impeding the participant’s performance. Make all efforts to reconcile the problems.

You cannot require a sponsor to retain any WEP participant whom they believe is unsatisfactory. Hopefully, sponsors will use your services to resolve problems with a WEP participant before termination occurs.

Require sponsors to complete the *Work Experience Participant Evaluation* at the time of termination for each WEP participant. When the sponsor requests termination, require the sponsor to specify the reason for termination and identify those areas of individual performance that were unsatisfactory.

For participants who leave the WEP assignment to accept regular employment or reach their WEP placement time limit, be sure the sponsor’s evaluation indicates whether a positive job reference would be provided if the participant requested one.

Worksite Safety and Workers' Compensation

Legal reference: 441 IAC 93.7(4)"f"(3)

Policy: HHS is required to provide workers' compensation insurance coverage for PROMISE JOBS work experience participants. Worksite safety for PROMISE JOBS participants is the responsibility of the WEP sponsor.

Worksite safety is important for two reasons:

- To protect PROMISE JOBS participants from worksite hazards, and
- To prevent increases in workers' compensation premiums.

Procedure: Expect WEP sponsors to follow their own safety rules in:

- Assigning PROMISE JOBS participants to appropriate tasks.
- Providing adequate training in the use of equipment and adjusting to the worksite.

Emphasize to WEP sponsors the importance of following work place safety rules with PROMISE JOBS participants:

- Require each WEP sponsor to give you a copy of the safety rules in effect at the site where the participant is working.
- Require each WEP sponsor to give you a list of all safety equipment provided by the sponsor and all safety equipment needed and not provided by the sponsor.
- Obtain the rules and safety equipment lists before the first PROMISE JOBS participant is referred for WEP at that worksite.
- Review the safety rules and training procedures with each sponsor when you receive them and include them in your central file.

Document in participant case files the steps you take to protect PROMISE JOBS participants. Include a copy of the WEP sponsor's safety rules and safety equipment lists at the time you make a WEP assignment or provide another clear form of documentation. Your central file and PROMISE JOBS case files will be monitored for adequate documentation of these work site safety precautions.

When an accident occurs, require the participant to file a Workers' Compensation claim in the PROMISE JOBS office, using IAIABC Form 1.2, *Iowa Workers' Compensation - First Report of Injury or Illness*. Obtain these forms from the Internet web site: www.iowaworkforce.org by accessing Workers' Compensation/Forms and Publications.

Complete the form with the participant. Contact IWD/PROMISE JOBS central office for instructions on notifying the Workers' Compensation insurance carrier.

Send two copies to the PROMISE JOBS Coordinator, Iowa Workforce Development Central Office. One copy shall be forwarded to HHS, Division of Community Access, Bureau of Financial, Food, and Work Supports.

Supportive Payments for WEP

This section includes the following:

- [Transportation and Childcare](#)
- [Required clothing and equipment](#)

Transportation and Child Care

Legal reference: 441 IAC 93.7(4)"f"(1)

Policy: WEP participants may be eligible for Child Care Assistance (CCA) and transportation supportive payments if needed for participation in WEP.

Procedure: Use PJCase system to issue transportation supportive payments to participants prior to the start of WEP. **Exception:** Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having an SSN.

Approve CCA before the start of WEP. Use form 470-4558 or 470-4558(S), *Notice of Decision: Child Care*, to approve CCA through entry in KinderTrack system. Authorize a CCA payment after the provider has provided care and submits an attendance sheet to bill for the care.

See [Supportive Payments: Transportation](#) and [Child Care Assistance](#) for more information on authorizing transportation and CCA.

Required Clothing and Equipment

Legal reference: 441 IAC 93.7(4)"f"(2)

Policy: WEP participants may be eligible for up to \$100 to cover the cost of required clothing and equipment needed to work at the WEP site if not provided by the WEP sponsor.

Procedure: If the WEP site provides required clothing, shoes, gloves, and health and safety equipment for the performance of work under the program for their paid employees, require the WEP site to provide the same to the WEP participant, unless the participant already possesses such clothing or equipment. Items provided by the worksite remain the property of the worksite, unless the participant and the worksite agree to a different arrangement.

When the WEP site employer reports a need for safety equipment that the employer does not provide to employees, document the type of need and anticipated cost in the case file. If the employer does not know the cost, ask the participant to provide the cost on form 470-0510, *Estimate of Cost*.

Use PJCase system to issue a payment to cover the cost for the needed safety equipment (for example, steel-toed shoes) up to a limit of \$100 per participant per work site assignment. **EXCEPTION:** Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having a SSN. When possible, issue the payment to the vendor. Otherwise, issue the payment to the participant. If the cost of the safety equipment is more than \$100, notify the participant and the work site that the WEP assignment is not acceptable.

Ensure that participants are not required to use their FIP grant or their income or resources to pay any portion of their participation costs, such as expenses described above.

Unpaid Community Service

Legal reference: 441 IAC 93.7(5)

Policy: In unpaid community service (UCS), the participant performs unpaid work for the direct benefit of the community within a public or private nonprofit organization. The unpaid work must also improve the employability of the participant. UCS includes participation in court-ordered community service.

Procedure: Use UCS to establish or reestablish contact with the work force or gain needed work experience in a nonthreatening environment while providing services that are of direct benefit to the community.

Use UCS for participants who are not ready for more intensive efforts toward self-sufficiency at this time. It is expected that the UCS work site will be less demanding than work experience placements. Specific skills-training tasks are not required.

Due to Department of Labor standards, participants might not be able to participate full-time in unpaid community service. Participants may combine this activity with another such as, but not limited to, high school completion, ESL, other part-time education or training, FaDSS or other family development services, and parenting skills training.

The following sections provide more information regarding UCS and explain procedures including available supportive payments:

- [Difference Between Unpaid Community Service and Work Experience](#)
- [Unpaid Community Service Worksites](#)
- [Using Unpaid Community Service as an FIA activity](#)
- [Supportive Payments for Unpaid Community Service](#)

Difference Between Unpaid Community Service and Work Experience

Both WEP and UCS are unpaid work. However, UCS must also serve a useful community purpose. An unpaid position in a non-profit or public agency could either be WEP or UCS position. If the duties assigned to the participant closely match the requirements of paid employees, the activity might better be labeled as work experience.

EXAMPLE:

Both Ms. A and Ms. B are working without pay at the public library.

- Ms. A shelves books and works the checkout counter. This may be better described as a WEP.
- Ms. B's only duty is to read to the children during "story hour." This may be better described as unpaid community service.

Appropriate Unpaid Community Service Work Sites

Legal reference: 441 93.7(5)"a" and "b"

Policy: Acceptable UCS sites are public or non-profit organizations in fields such as:

- Health,
- Social services,
- Environmental protection,
- Education,
- Urban and rural development,
- Welfare,
- Recreation,
- Public facilities,
- Public safety, and
- Child care.

The site is expected to assign a participant with tasks or services that will directly benefit the community while providing the participant with work experience.

UCS work sites must be public or private nonprofit organizations. The placement shall:

- Not be related to political, electoral or partisan activities.
- Not be developed in response to or in any way associated with the existence of a strike, lockout or other bona fide labor dispute.
- Not violate any existing labor agreement between employees and employer.
- Comply with applicable state and federal health and safety standards.
- Not be used by work site organizations to displace current employees or to infringe on their promotional opportunities.
- Not be used in place of hiring staff for established vacant positions.
- Not result in placement of a participant in a position when any other person is on layoff from the same or an equivalent position in the same unit.
- Not discriminate against any program participant because of race, creed, color, religion, sex, national origin, age, physical or mental disability, sexual orientation, or gender.
- Worksites within faith-based organizations may be used only when work performed is nonsectarian and not in support of sectarian activities. Worksites may not use participants to replace regular employees in the performance of nonsectarian work to enable regular employees to engage in sectarian activities.

Procedure: Develop local listings of potential UCS worksites. Work with entities and agencies in your area to maintain and add to this list.

Provide UCS work sites a written explanation of the placement criteria as stated above. Document this explanation in the case file, using narrative or copy of the explanation.

Using Unpaid Community Service as an FIA Activity

Legal reference: 441 IAC 93.7(5)

Policy: Though you provide the participant with possible placement sites, the participant has the final responsibility for locating and making arrangements with the unpaid community service worksite.

Procedure: Unpaid community service needs to be included as a current FIA activity before requiring a participant to begin locating an unpaid community service site. Schedule the participant to discuss the requirements of UCS or to discuss renegotiation of the FIA if needed.

Participants should have adequate job-seeking skills, interviewing skills, and the basic ability to conform to workplace rules, expectations, and values, before assignment to UCS. You may choose to have participants who do not yet have these skills to attend job readiness skills training before to assigning the participant to UCS.

When UCS is included in the participant's FIA:

- Assist the participant in selecting a worksite by providing your local listing of potential sites. Help the participant match their skills and interests to the needs of the UCS worksite. The willingness of the participant and the satisfaction that an agency has with an UCS placement are dependent on this match. Consider that the outcome of the placement may influence an agency's willingness to accept future participants.
- Expect the participant to locate, contact, and apply to an appropriate UCS worksite. A formal interview is not required.
- Determine the monthly number of hours the participant will participate and make certain that it does not surpass the limits as described at [WEP and UCS Participation Requirements and Limits](#).

Notify the participant in writing of the:

- Time frame for locating an UCS worksite that will accept the participant. Allow at least 10 calendar days from the date the notice is mailed or given to the participant.
- Expected monthly hours of participation in UCS.
- Time frame for providing their monthly schedule and a description of the work tasks.

The participant and the worksite need to determine:

- The monthly schedule,
- The length of assignment, and
- The tasks or services that the participant will be performing.

Require the participant to provide you with their monthly schedule and a description of the tasks the participant will be performing.

Once the participant has an arrangement with a UCS worksite:

- Expect the worksite to verify the participant's actual hours of participation for each month on form 470-2617, *Time and Attendance*.
- Require the participant to provide the attendance form by the 10th calendar day of the following month, unless the worksite returns the form.

- Notify the participant in writing of the requirement to verify actual UCS hours by including the specific expectation in the FIA.

Once you have verified actual hours of participation in UCS, report the hours each month through entry in IowaWORKS. Report scheduled UCS hours missed for an excused reason when allowable as described at [Excused Absence and Holiday Hours](#).

If a participant fails to secure a community service arrangement or fails to provide verification of unpaid community service hours, make every effort to resolve the issue prior to determining if the participant is choosing a limited benefit plan.

Comment: Court-ordered community service is acceptable as UCS and is not subject to the limits as described at [WEP and UCS Participation Requirements and Limits](#).

Supportive Payments for Unpaid Community Service

Legal reference: 441 IAC 93.7(5)“e”93.115(4)

Policy: UCS participants may be eligible for Child Care Assistance (CCA) and transportation supportive payments if needed for participation in UCS.

UCS work sites may offer on-site child care and transportation to and from the site. Participants are not eligible for child care and transportation assistance when these services are available to them at no cost.

Procedure: Use PJCase to issue transportation supportive payments to participants prior to the start of UCS. **EXCEPTION:** Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having a SSN.

Approve CCA before the start of USC. Use form 470-4558 or 470-4558(S), *Notice of Decision: Child Care*, to approve CCA through entry in KinderTrack system. Authorize a CCA payment after the provider has provided care and submits an attendance sheet to bill for the care.

See [Supportive Payments: Transportation](#) and [Child Care Assistance](#) for more information on authorizing transportation and CCA.

WEP and UCS Participation Requirements and Limits

Legal reference: 441 IAC 93.7(4)“d” and 93.7(5)“c”

Policy: Under WEP or UCS, a participant reports to the worksite as scheduled and performs work tasks or services as if the participant were employed.

When a participant performs tasks or services that are comparable to employment while at a WEP or UCS worksite, the Department of Labor's Fair Labor Standards Act (FLSA) considers this "employment." The FLSA requires that the participant be compensated at the federal or state minimum wage, whichever is higher, for the time spent completing the tasks or services.

Required hours of participation in the unpaid work activities of WEP and UCS cannot exceed the amount of compensation divided by the federal or state minimum wage, whichever is higher. A family's compensation is determined in the following manner:

- For a single parent family with a child under the age of six, the family's monthly FIP grant plus SNAP counts as compensation.
- For a single parent family without a child under the age of six, or a two-parent family, the family's monthly FIP grant counts as compensation.

Procedure: Determine the hours of participation in WEP or UCS before referring a participant for an interview at a WEP or UCS site:

- Consider the needs of the worksite and the participant, and
- Determine if the activities that the participant will be performing are subject to the FLSA by reviewing the job description provided by the worksite or contacting the worksite.

Most activities at a WEP or UCS site are comparable to work and subject to the FLSA.

Use the PJCase system to determine the maximum monthly hours of participation allowed for WEP or UCS. Remember, court-ordered community service is not subject to this limit. All court-ordered hours may be counted as participation.

PJCase calculates and displays the maximum monthly hours allowed for participation in WEP or UCS in the next calendar month in the WEP/CS HOURS LIMIT field of the PJCase Person screen. This maximum monthly hours total applies to the entire family.

If two or more FIA-responsible members of the same FIP family participate in WEP or unpaid community service activities, the required hours of participation for all FIA-responsible members **totaled together** cannot exceed the maximum hours appearing in the WEP/CS HOURS LIMIT field of the PJCase Person screen in the next calendar month.

For WEP, include the maximum monthly hours of participation on form 470-4810, *Referral for Work Experience (WEP) Placement*. If the sponsor accepts the participant for assignment, the sponsor and participant will need to determine a schedule of hours that is within this limit for the current calendar month. The schedule may need to be adjusted monthly so that hours do not exceed the monthly limit.

For UCS, provide the participant with an explanation of the issue and the hours limit and have them work out their hours with the community service worksite.

Procedure for Adjusting Hours of Participation in WEP or UCS

When reviewing hours of participation in WEP or UCS for the prior month, check PJCase and scheduled hours of participation to determine if the participant's maximum hours have changed and if required hours of participation need to be adjusted for the next month.

If maximum hours of participation for WEP or UCS have changed, this means the amount of the grant, or SNAP if applicable, has changed. Determine the reason for the change by reviewing the following:

- IowaWORKS for the current FIP and SNAP amounts, if applicable,
- WISE system for indication of a change in earnings or other income, or
- WISE/FET for a change in family members or FIP amount.

Contact the IM worker if you cannot determine the reason for changed benefits.

Schedule the participant to discuss renegotiation of the FIA when appropriate.

If participation in WEP or UCS needs to be terminated, or if the participant's schedule needs to be changed, notify the worksite and participant in writing of the:

- Termination, or
- Participant's new monthly maximum limit and the need to change the participant's scheduled hours of participation.

Change or terminate WEP or UCS as of the first of the next calendar month.

If the participant is receiving child care or transportation for participation in WEP or unpaid community service, send a timely notice if:

- The amount of transportation changes.
- The number of approved child care units change.
- Eligibility ends.

See [Written Notice to Participant](#), [Notice of Decision](#), and [13-G, Notice of Decision: Child Care](#).

Refusing, Ending, or Reducing Employment and Other Work Activities

Legal reference: 441 IAC 41.24(8) and 93.13(239B)

Policy: This policy applies to all work activities: all employments, on-the-job training, WEP and UCS. All of these work activities are considered employment for the purposes of this section.

Participants whose employment is part of the FIA are choosing the LBP if they refuse, end, or reduce employment without a justification listed under [Problems With Participation](#) or [Barriers to Participation](#) unless the participant resolves the issue. This includes a participant who is discharged from employment due to the participant's misconduct.

Procedure: Inform every participant whose employment is part of the FIA that refusing, ending, or reducing employment without an acceptable reason means they are choosing the LBP. Stress to them the importance of contacting you if they are having problems at work. You may be able to help them through that situation and avoid moving to an LBP.

Consider that the participant has chosen the LBP after signing the FIA when you determine that the participant has refused, ended, or reduced employment that is part of the FIA for reasons not included under [Problems With Participation](#) or [Barriers to Participation](#) unless the participant resolves the issue. Follow the policies and procedures under [FIA Participation Issues](#) to allow the participant an opportunity to resolve the issue.

NOTE: Iowa Workforce Development's definition of "good cause" for job separation differs substantially from the PROMISE JOBS definition. You must disregard a determination that a person is disqualified from receiving unemployment benefits when considering whether a PROMISE JOBS participant's action to end employment is justified.

Use the following procedure when you become aware that a participant has refused employment, ended a job, or reduced employment.

1. Contact the participant to get an explanation of the circumstances surrounding the employment situation. **Until you have discussed the situation with the participant, you do not know if the person's action indicates that the person has chosen the LBP.**

When you learn of the employment situation while meeting the participant for other reasons, discuss the circumstances with the participant at this time. Otherwise, schedule an appointment to discuss the circumstances surrounding the employment situation. See [Written Notice to Participant](#).

This applies even when you have a copy of form 470-2844, *Employer's Statement of Earnings*, stating that the person voluntarily quit employment. The person may have a valid reason for refusing, ending, or reducing the employment. You need to provide the person with an opportunity to explain.

If the participant fails to attend the appointment, the participant is choosing the LBP. Attempt to resolve the issue of failure to attend the appointment. See Issue 2 under [Identifying Participation Issues](#).

Go to step 2 when the participant appears for the appointment.

2. Discuss the employment situation with the participant. Ask the participant to tell you the reason that the employment ended, or employment was refused, or the participant reduced hours of employment.

Explain that the employment situation will be a choice of an LBP unless the situation occurred due to a problem or barrier to participation that is allowed by policy. Document the participant's explanation in the case record.

Also tell the participant that if the job in question is still open and the participant returns to the job, or if the participant starts another job equal to the job in question, the issue will be resolved when PROMISE JOBS receives verification.

Go to step 3 after discussing the situation with the participant.

3. Determine if the participant's explanation indicates that the person should be excused for the employment situation. See [Problems With Participation](#) or [Barriers to Participation](#).

When the participant gives you a reason that excuses the employment situation, and the statement appears to be accurate and consistent with other circumstances, you need not require any further documentation. Renegotiate and modify the FIA as appropriate.

When the participant states that the employment situation occurred due to a problem or barrier to participation that is allowed by policy, but you determine that documentation is needed to support the person's statement, give the person an opportunity to provide the documentation before considering whether the person has chosen an LBP. You may accept the participant's statement without documentation; it is not required.

When documentation is needed, request the documentation in writing. Explain that the employment situation will be considered a choice of the LBP if the participant does not provide the requested documentation. Allow the participant at least 10 calendar days to provide the documentation. See [Written Notice to Participant](#).

Examples of supporting documentation include, but are not limited to:

- Statements from co-workers.
- Medical documentation of illness or inability to perform the work requirements.
- Documentation of a complaint filed with an organization that represents employee rights.

NOTE: Never require a person to file such a complaint.

If you need more complete information from the employer, you may contact the employer based on the authorization to furnish information to HHS included in the *Employer's Statement of Earnings*.

If the 60-day period authorized by the participant on the *Employer's Statement of Earnings* has expired, you may ask the participant to sign a *Consent to Obtain and Release Information*.

When you have all of the needed information from the participant and the employer, weigh all of the evidence and consider all of the circumstances when determining whether the person should be excused for the employment situation. Do not rely solely on the employer's statement.

If you find that the employment situation is excused due to a problem or barrier to participation that is allowed by policy, renegotiate and modify the FIA as appropriate. Document your decision in the case file.

Otherwise, go to step 4.

4. Attempt to resolve the issue by following the policies under [Identifying Participation Issues](#) when:

- The employment issue was caused by the participant and the participant does not have a problem or barrier to participation according to policy for causing the issue, or
- The participant gives a reason that needed documentation to support it and the participant fails to provide the documentation.

Defining Misconduct

Legal reference: 441 IAC 93.13(2)"i"

Policy: This policy applies to all work activities: all employments, on-the-job training, WEP and unpaid community service. All of these work activities are considered employment for the purposes of this section.

The PROMISE JOBS program defines "misconduct" as a deliberate act or failure to act by the participant. Consider misconduct to be a material breach of the duties and obligations agreed upon between the employer and employee at the time of hire.

To be considered "misconduct," the employee's conduct must demonstrate a willful violation or disregard of the standards of behavior that the employer has the right to expect of employees.

Any conduct that is not an intentional decision by the employee to act or fail to act is not misconduct. An employee is not guilty of misconduct when the discharge is the result of the employee's:

- Mere inefficiency.
- Unsatisfactory conduct when unintentional.
- Failure to perform well due to inability or incapacity.
- Ordinary negligence in isolated instances.
- Good faith errors in judgment or discretion.

An employee is not guilty of misconduct when the employee's reason for the conduct was justified according to [Problems With Participation](#) or [Barriers to Participation](#).

Basic Education Services

Legal reference: 441 IAC 93.8(239B)

Policy: Participants may choose to include basic education as an FIA activity.

Basic education training includes the following:

- High school completion activities.
- Adult basic education (ABE).
- High school equivalency activities, including testing for an equivalency diploma English as a second language (ESL).

Procedure: With the goal to improve employability, use basic education training as an FIA activity for referred persons who need to:

- Complete high school or obtain an equivalent diploma
- Improve their ability to read and speak English, or
- Prepare for a specific vocational area of employment.

Complete an additional assessment as described at [Educational Evaluation](#) prior to including basic education training in a referred person's FIA when necessary. As part of the assessment process, require participants to do the following when appropriate:

- Take nationally recognized vocational tests, including the general aptitude test battery.
- Provide grade transcripts from previous education or training.

EXCEPTION: A participant under the age of 19 does not need to complete an educational evaluation in order to include high school completion or the equivalent in their FIA.

Use testing, when available, to determine the projected length of time needed for completion for participants requesting high school equivalency, ABE, or ESL training as an FIA activity. This will determine the how long basic education will be included as an FIA step.

When a participant is wanting to include basic education in their FIA, notify the participant in writing of the need for grade transcripts or testing and allow the person at least 10 calendar days to provide the information as described at [Written Notice to Participant](#).

For an applicant, list any needed testing and grades as action steps of the applicant's FIA. Allow the applicant at least 10 calendar days to provide the information as described at [Written Notice to Participant](#).

Once you have all needed information, renegotiate the FIA to include the basic education training plan with the specific training goal and anticipated completion date. See [Training Goals and Time Limits](#) later in this section for more information. See [Using Basic Education in the FIA](#) for more information.

All family members who meet basic education training eligibility criteria are eligible for all program benefits. This is true even if two or more family members participate at the same training facility or in the same program.

The following policies described at [Postsecondary Education and Training](#) also apply to basic education services:

- [Participant requirements](#)
- [Disposal of supplies upon plan termination](#)
- [Termination of a training plan](#)
- [Participation issues specific to classroom training](#)

The following sections give more detailed information on education policies for:

- [High school completion and equivalency diploma](#)
- [Approvable training providers](#)
- [Training goals and time limits](#)
- [Using Basic Education in the FIA](#)
- [Supportive payments for basic education](#)

High School Completion and High School Equivalency Diploma

Legal reference: 441 IAC 93.8(3)

Policy: Participants who have not obtained a high school diploma or a high school equivalency diploma shall be encouraged to obtain a diploma. High school and equivalency training courses may run concurrently with other vocational training. Participants who have not completed high school or received a high school equivalency diploma may be required to do so before courses leading to an associate degree or higher may be approved.

Unless they are under the age of 18, approve participants to return to regular high school only when they can graduate within one year of their normal graduation date.

Some minor parents are required to participate in high school completion or equivalency training. Refer to [FIA Options for FIA-Responsible Persons Aged 19 and Younger](#) for additional information.

Procedure: Require participants who have not completed high school or received a high school equivalency diploma to do so before courses leading to an associate degree or higher are approved unless not required for the specific training program. Even if not required by the specific training program, strongly encourage the participant to obtain their high school education either before the postsecondary training or concurrently with the training.

Approvable Training Providers

Legal reference: 441 IAC 93.8(2)

Policy: Basic education services can be provided by both public and private agencies that meet one of the following criteria:

- The facility is approved or registered with the state.
- The facility is accredited by an appropriate accrediting agency.

In addition to traditional training facilities, PROMISE JOBS can take advantage of nontraditional training opportunities. Some examples of approvable training providers that are applicable for basic education are as follows:

- Trade schools.
- Job Corps and Job Corps Solo Parent Program.
- Church-sponsored ESL courses, parenting skills training, or others.

Approvable basic education training providers must offer training that is structured in such a way that a participant's actual hours of attendance can be verified and the provider must be willing to provide verification of time and attendance.

Procedure: Require training providers to verify hours of attendance in classroom activities, lab activities, and in supervised study activities monthly by signing and dating form 470-2617, *Time and Attendance*.

EXCEPTIONS:

- Distance learning training providers may verify actual hours of participation in basic education activities through an alternate method determined through discussion between the provider and PROMISE JOBS. See [Distance Learning](#) for more information.

- When the participant is under age 20 and in high school or high school equivalency training, the provider is **not** required to verify the participant's hours of attendance. The participant can verify the hours by completing and submitting the *Time and Attendance* form monthly. The training provider or representative does not need to sign or date the form. PROMISE JOBS needs to contact the training provider (with proper authorization from the participant) if information provided by the participant is questionable.

Deny a participant's request for a specific training and do not allow the participant to include the training in the FIA when:

- The participant's actual hours of participation cannot be verified due to the structure of the training, or
- The provider is not willing to provide verification of time and attendance.

If a training provider refuses to verify a participant's hours of attendance on training that is included in the FIA, follow the procedures at [Training Provider Requirements](#) to attempt to negotiate for a solution.

Training Goals and Time Limits

Legal reference: 441 IAC 93.8(5)

Policy: For participants in high school or high school equivalency activities, ABE, or ESL, the vocational goal to be included in the FIA is to improve employability by successfully completing the activity.

Approve a participant aged 18 and older to return to regular high school only when the participant can graduate within one year of their normal graduation date.

Procedure: Participants enrolled in ABE or ESL programs are expected to complete training in the time determined by testing.

However, you and the participant's academic advisor or instructor may agree that additional time should be allowed, up to six additional months. Do not allow any additional time if months required to complete training would exceed:

- 24 months for ABE.
- 12 months for ESL.

For participants in high school and equivalency classes, the education provider determines when the participant should be expected to complete the training.

Using Basic Education in the FIA

Legal reference: 441 IAC 93.8(5)

Policy: Once a participant is approved for training, a training plan shall be developed and written into the participant's FIA. The training plan shall include:

- The participant's specific vocational goal. For participants in basic education, the goal is to improve their employability by completing the training.
- The approved educational activities.
- The hours of enrollment. Participants are encouraged to maintain as full an academic workload as possible in order to complete their education in a timely manner. However, a person may choose to participate in education on a part-time schedule and include other activities such as employment, job-seeking skills, or other activities in the FIA.
- A date by which the participant expects to complete training. This end date depends on:
 - Time frames specified for a program as established by the educational facility.
 - Whether the participant is attending full-time or part-time.
 - Problems or barriers to participation.
- The participant's requirement to provide verification of their actual hours of participation for each month on *Time and Attendance*, form 470-2617 by the 10th calendar day of the month following the month of participation.

A participant with an approved basic education training plan who fails to maintain education activities as specified in their FIA has chosen an LBP unless problems or barriers to participation apply.

Procedure: If needed, renegotiate the FIA to include the training plan. Notify the participant in writing of the appointment to renegotiate the FIA as described at [Written Notice to Participant](#). Allow the participant at least 10 calendar days from the date the notice is mailed or given to the participant to appear for the appointment.

Expect the training provider to verify the participant's actual hours of participation in class, labs, and supervised study time for each month on *Time and Attendance*, form 470-2617 for basic education training. Include in the FIA the participant requirement to provide the completed attendance form to PROMISE JOBS by the 10th calendar day of the following month. See [Training Provider Requirements](#) earlier in this section for more information.

EXCEPTION: When the participant is under age 20 and in high school or an equivalency program, the provider is not required to verify the participant's hours of attendance. The participant must verify their class, lab, and study time hours by completing and submitting

the *Time and Attendance* form monthly. The training provider or representative does not need to sign or date the form. PROMISE JOBS needs to contact the training provider (with proper authorization from the participant) if information provided by the participant is questionable.

Once you have verified actual hours of participation in basic education training, report the monthly actual hours of participation in class, labs, and supervised study time through entry in IowaWORKS. You may also report up to one hour of unsupervised study time for each hour of class time. See [Reporting Participation Hours](#) for limits and more information. Report scheduled basic education training hours missed for an excused reason when allowable as described at [Excused Absence and Holiday Hours](#).

When a participant with an approved basic education plan fails to maintain education activities as described in the FIA, follow the procedures described at [Participation Issues Specific to Postsecondary and Basic Training](#), [Problems With Participation](#) and [Barriers to Participation](#).

Supportive Payments for Basic Education

Legal reference: 441 IAC 93.8(6)

Policy: Participants enrolled in basic education may be eligible for the following when needed for participation:

- Child Care Assistance (CCA)
- Transportation supportive payments
- Fees for school enrollment, school testing or school application, provided the fees are:
 - Fees for school enrollment, school testing or school application Related to the training plan and
 - Approved by the PROMISE JOBS worker before being incurred.
 - Fees for educational grant or scholarship application. Since receipt of grants or scholarships will be needed to meet the participant's educational costs, these are allowable costs provided the PROMISE JOBS worker approves them before they are incurred.
 - Fees for certification and testing, provided the PROMISE JOBS worker approves them before they are incurred.
 - Travel costs required for certification or testing, subject to the limits under [Transportation](#).
 - Practicum expenses. When the curriculum of a course of study requires a practicum which is not available within driving distance of the participant's home, a \$10 per diem allowance is available to help with living costs. See [Practicum Living Costs](#) for additional information.

- Direct education costs, including.
 - Tuition, limited to the actual cost of tuition.
 - Fees, including graduation.
 - Books required for participation.
 - Basic school supplies, limited to the standard \$10 allowance as described at [Fees, Books, and Supplies](#).
 - Specific supplies, including tools, and required uniforms, related to obtaining credit for a course and required of all students in a course.

Eligibility for PROMISE JOBS supportive payments for basic education training begins with the date the participant begins training under an approved plan and is terminated when the training plan is either completed or cancelled. If a participant is already enrolled in training prior to being referred to PROMISE JOBS, or enters training prior to having an approved training plan, supportive payments will be provided beginning from the date the training plan is approved and included in the FIA, not the date of enrollment.

Procedure: Use PJCase to:

- Issue transportation supportive payments to participants prior to the start of basic education classes.
- Issue payment for the educational costs.

Exception: Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having an SSN.

Approve CCA before the start of basic education classes. Use form 470-4558 or 470-4558(S), *Notice of Decision: Child Care*, to approve CCA through entry in KinderTrack system. Authorize a CCA payment after the provider has provided care and submits an attendance sheet to bill for the care.

See [Supportive Payments: Transportation](#) and [Child Care Assistance](#) for more information on authorizing transportation and CCA.

Observe the following limits when approving payments for direct education costs for participants in basic education components (high school completion and equivalency ABE, or ESL):

- Do not allow tuition supportive payments that exceed the rate charged by the Iowa community college nearest to the participant's home that offers a program comparable to the one in which the participant plans to enroll.

- If a community college in Iowa does not offer a comparable program, do not allow maximum tuition payment that exceeds the Iowa resident rate charged by the out-of-state community college located nearest to the participant's home.
- Allow a standard allowance for basic school supplies of \$10 per term or actual costs, whichever is higher, for participants who request it. Require a claim for actual costs higher than \$10 to be verified by receipts.
- Require participants to furnish receipts for other expenditures that they pay with PROMISE JOBS supportive payments, except for transportation payments. Remind participants that failure to provide the receipts will preclude additional payments.

Postsecondary Education and Training

Legal reference: 441 IAC 93.8(239B)

Policy: Postsecondary education refers to any academic or vocational course of study that prepares a participant for a specific professional or vocational area of employment. A degree in general studies or programs not leading to a specific occupational outcome cannot be included in a participant's FIA.

Postsecondary and training activities are designed to help increase the participant's employability and earning potential. Though employment is the eventual goal of all FIAs, it is recognized that education increases the likelihood of finding work, particularly work that leads to economic self-sufficiency.

Any participant who requests participation in educational activities needs to be evaluated to determine the likelihood of success. If the request is approved, a training plan needs to be developed and included in the FIA-responsible person's FIA.

All postsecondary training is considered to be vocational training, because a postsecondary training plan must be occupation-specific to be approvable under PROMISE JOBS. See Participant Requirements and [Nonapprovable Training](#) for more information.

All family members who meet postsecondary training eligibility criteria are eligible for all program benefits. This is true even if two or more family members participate at the same training facility or in the same program.

To include postsecondary education in the FIA, the participant must:

- Have a vocational goal for which labor market information or emerging business trends indicate employment potential
- Be likely to succeed as shown by an educational evaluation
- Current educational level shows a deficit in knowledge, skills and abilities which support employment in jobs which lead to self-sufficiency

Procedure: Consider enrollment in the PROMISE JOBS postsecondary training component for participants who demonstrate capability and who express a desire to participate in postsecondary classroom training. Under PROMISE JOBS, “postsecondary training” means any academic or vocational training course of study that enables a participant to prepare for a specific professional or vocational area of employment.

Base a postsecondary training plan on occupational evaluation and assessment as obtained in accordance with the process described at [Educational Evaluation](#). See [Participant Requirements](#) for more information.

When renegotiating or amending an FIA to include a training plan, participants must provide all information required to include the training plan in the FIA.

When requesting additional information needed to complete the postsecondary training portion of an FIA, follow the policies at [Written Notice to Participant](#).

See [Transportation](#) when two members of the same household are attending the same activity with identical schedules.

The following sections explain:

- [Participant Requirements](#)
- [Training Provider Requirements](#)
- [Approvable Training Activities](#)
- [Nonapprovable Training](#)
- [Including postsecondary education in the FIA](#)
- [Use of Academic Probation](#)
- [Education Supportive Payments](#)
- [Termination of a training plan](#)
- [Participation issues specific to classroom training](#)

Participant Requirements

Legal reference: 441 IAC 93.8(1)

Policy: The participant must:

- Have a vocational goal for which labor market information or emerging business trends indicate employment potential.
- Be likely to succeed as shown by an educational evaluation.

EXCEPTION: A participant under the age of 19 does not need to complete an educational evaluation in order to have high school completion included in their FIA.

- Current educational level shows a deficit in knowledge, skills and abilities which support employment in jobs which lead to self-sufficiency.

Procedure:

Vocational goal:

Before approving a training plan and including that activity as part of a participant's FIA, you must decide if the training is likely to lead to employment. You may use available labor market information or emerging business trends in the participant's local area to indicate this employment potential. You may access this type of information through:

- The Department of Workforce Development, Labor Market information
- Private employment agencies, or
- Local employers providing jobs paying at least minimum wage for which the education is being requested.

If this information does not support the availability of employment in the field in which the participant is requesting training, document the information you reviewed, share that information with the participant, deny the training plan and issue form 470-0602, *Notice of Decision: Services* as described in [Written Notice to Participant](#).

Information to support employment potential in the participant's local area is not required when:

- The participant has a documented job offer in the field before entering the training; or
- The participant is willing to relocate after training to an area where there is employment potential. Document the availability of employment in the new area.

When you do not allow a particular training plan for this reason, document the source of your labor market statistics and the basis for your decision. Documentation can be, but is not limited to, one or more of the following items:

- A computer printout.
- A photocopy of source documents.
- A clear written statement in the case file narrative of **both** the sources you consulted and your rationale for the decision that the training was nonapprovable under PROMISE JOBS policies.

Include copies of this documentation with an appeal summary when:

- A participant appeals the contents of the FIA.
- A participant appeals the *Notice of Decision: Services* you issue to deny the training plan.

Likelihood of success:

Before approving or denying a training plan, you must determine if the person has a reasonable likelihood of success by completing a postsecondary education evaluation as described at [Educational Evaluation](#).

If, through the evaluation, you have concerns that the person may not be able to succeed, you may approve the training plan conditionally and place the participant on academic probation for one term. If the participant meets the expectations as specified under the academic probation remove them from probationary status. If they do not meet those specified expectations, terminate the training plan. In this circumstance, be sure to make it very clear to the participant that the continuation of their training plans is contingent upon their ability to meet the agreed upon expectations. See [Use of Academic Probation](#) for more information.

If you determine, through the evaluation, that the participant is not likely to succeed in the requested training, document the information you reviewed, share that information with the participant, deny the training plan and issue form 470-0602, *Notice of Decision: Services* as described in [Written Notice to Participant](#).

Current Educational Level:

Consider a participant's current educational level when approving or denying a participant's request to include postsecondary education in the FIA. When a participant has received training in the past, even training supported by PROMISE JOBS, this **does not** preclude them from receiving further training.

Participants with no postsecondary education may be approved for training resulting in a certificate of program completion or an academic degree, such as an associate or baccalaureate degree. Require participants who have not completed a high school education or high school equivalency to do so before courses leading to an associate degree or higher are approved unless not required for the specific training program.

Even if not required by the specific training program, **strongly encourage** the participant to obtain their high school education either before the postsecondary training or concurrently with the training.

A participant who has successfully completed a postsecondary educational program that resulted in less than a baccalaureate degree may be approved for further training when any of the following apply:

- The training requested is a progression in a specific career that moves a participant from entry-level positions to higher levels of pay, skill, responsibility, or authority.
- The previous training is in an occupation that is outdated.

- The previous training is in a field where current labor market information statistics or emerging business trends show little or no employment opportunity.
- The participant's background makes employment in the area in which the participant is trained impossible.
- Changes in the participant's physical or mental status make employment in the area in which the participant is currently trained no longer appropriate. The participant must provide supportive evidence from a qualified medical or mental health professional or the Iowa Vocational Rehabilitation Services (IVRS).

Consider a participant who has a baccalaureate degree or higher as employable. Do not approve any further training unless changes in the participant's situation make employment in the area in which the participant is currently trained no longer appropriate such as:

- The participant's physical or mental status has changed. The participant must provide supportive evidence from either a qualified medical or mental health professional or the Iowa Vocational Rehabilitation Services (IVRS) agency.
- Other significant changes have occurred for the participant, for example, employment in the area of current training requires background checks that the participant **cannot** pass or a license that the participant **no longer possesses** and **cannot regain**.

If you determine that the requested training is not appropriate given the current educational level of the participant, document the information you reviewed, share that information with the participant, deny the training plan and issue form 470-0602, *Notice of Decision: Services* as described in [Written Notice to Participant](#).

Training Provider Requirements

Legal reference: 441 IAC 93.8(2)

Policy: A training provider must:

- Be approved or registered with the state or accredited by an appropriate accrediting agency.

Training provided by a community action program, church, or other agency may be included in the FIA only if the PROMISE JOBS worker determines that:

1. The training is adequate and leads to the completion of the participant's vocational goal.
2. The training provider possesses appropriate and up-to-date equipment; has qualified instructors, adequate facilities, a complete curriculum, acceptable grade point requirements, a good job-placement history; and demonstrates expenses of training that are reasonable and comparable to the costs of similar programs.

- Offer training that is structured in such a way that a participant's actual hours of attendance in class, labs, and supervised study time can be verified by the provider.

The training provider is responsible for documenting a participant's actual hours of participation. The participant is responsible for providing the documentation to PROMISE JOBS by the 10th of the month following the month of scheduled participation as described at [Required Verification and Documentation](#), unless the provider provides the documentation to PROMISE JOBS by this date.

Procedure:

Type of Provider:

The diversity of PROMISE JOBS participants and training goals requires that a variety of training sources be available. Training can be provided by both public and private educational agencies.

PROMISE JOBS can also take advantage of nontraditional training opportunities from community action program (CAP) agencies, churches, or other entities providing training, if, in your judgment, the training is adequate and leads to the completion of the goal outlined in the FIA.

Some examples of nontraditional training providers are as follows:

- Trade schools.
- Entrepreneurial (self-employment) training.
- Job Corps and Job Corps Solo Parent Program.
- Church-sponsored ESL courses, parenting skills training, or others.
- Short-courses designed for CAP agencies to meet a community need for trained workers for an industry with job openings.

Use all available information regarding equipment, instructors, facilities, curriculum, grade point requirements, job placement history, and expenses. NOTE: These criteria do not supersede the policies found in [Approvable Training Activities](#) and [Nonapprovable Training](#).

Clearly document the basis for your decision to approve or disapprove a specific training provider in the case file. When denying training with a specific provider, issue form 470-0602, *Notice of Decision: Services*, to the participant to inform the participant of the denial. Use Approvable Training Providers and the legal references stated at the beginning of this section.

Ability to Verify Hours of Attendance: Expect training providers to verify actual hours of the participant's attendance in educational activities, lab activities, and supervised study activities monthly by signing and dating form 470-2617, *Time and Attendance*.

EXCEPTION: Distance learning training providers may verify actual hours of participation in basic education activities through an alternate method determined through discussion between the provider and PROMISE JOBS. See [Distance Learning](#) for more information.

Deny a participant's request for a specific training and do not allow the participant to include the training in the FIA when:

- The participant's actual hours of participation cannot be verified due to the structure of the training, or
- The provider is not willing to provide verification of time and attendance.

If a training provider refuses to verify a participant's hours of attendance on training that is included in the FIA:

- Follow policy at [Confidentiality](#) and contact the provider to explain the program verification requirements and that the participant will not be able to continue to use the activity as an FIA activity without verification and,
- Make every effort to negotiate for a solution that will result in the provider verifying hours of attendance. Involve supervisory staff if needed.

If the provider continues to refuse to verify a participant's hours of attendance, the participant will not be able to continue to use the training as an FIA activity.

Allow the participant to continue through the current semester or quarter before finding another provider.

Contact the participant in writing:

- Require the participant to document their attendance for the months remaining in the current semester or quarter on the *Time and Attendance* and sign and date the form.
- Require the participant to return the form by the 10th calendar day following the end of the month of participation or within 10 calendar days of the written request, whichever is later.

Record the provider's refusal in participant case files and notify other PROMISE JOBS staff in your area. Report the situation to your PROMISE JOBS Coordinators at IWD.

Approvable Training Activities

Legal reference: 441 IAC 93.8(3) 3

Policy: Postsecondary training may be approved up to and including a baccalaureate degree program under limitations as described below. The following training may be approved when **all** other requirements are met:

- Continuing education classes when needed for the participant to be recertified or retrained to reenter a field in which the participant was previously trained or employment to maintain certification needed to remain employed.
- Correspondence courses, only when the courses are required to complete a training plan but the courses are not offered by a training facility attended by that participant.
NOTE: Iowa Communications Network (ICN) classes or other instructor-led distance learning opportunities offered by Iowa schools are not considered correspondence courses.
- Out-of-state training only when at least one of the following is true:
 - Similar training is not available in Iowa.
 - Relocation required to attend a facility in Iowa would be unnecessary if attending an out-of-state facility, or
 - The only Iowa facilities within commuting distance are private schools where tuition charges are higher than an out-of-state facility which is within commuting distance.
- A participant with no postsecondary education may be approved for training resulting in a certificate of program completion or an academic degree, such as an associate or baccalaureate degree program. Participants who have not completed a high school education or received a high school equivalency diploma may be required to do so before courses leading to an associate degree or high are approved.
- Online or distance learning such as, but not limited to, training that is conducted over a video conferencing network or online or virtual courses may be approved when the training:
 - Includes interaction between the instructor and the student, such as required chats or message boards, and,
 - Includes mechanisms for evaluation and measurement of student achievement, and,
 - Includes a legitimate written method for verifying the participant's actual hours of participation, and,

- Is offered so that any testing or meetings with instructors occurs in Iowa unless the conditions for approvable out-of-state training apply. Consider an on-line training program to be an out-of-state training program when any of the required training or testing occurs outside the state of Iowa.
- Prerequisite courses, when required by a specific training program. **NOTE:** When participants fail to earn required credits for admission to the chosen program for academic reasons, do not approve them to repeat prerequisite courses.

A participant who requests withdrawal from a prerequisite course because of inability to complete the required course work satisfactorily may not repeat the course later.

If a participant is simultaneously taking two prerequisite courses, drops one due to inability to complete course work satisfactorily, and is therefore unable to gain admission to the training for which the courses were being taken, continuation in the second prerequisite course becomes valueless. Cancel the postsecondary training plan.

- Remedial course work for one term, when need is determined by testing conducted by the training facility.
- Summer school.
- Entrepreneurial training.

A participant who has a baccalaureate degree or higher is considered employable. No further training can be approved unless the participant's physical or mental status has changed to such an extent that the past education is no longer appropriate. The participant must provide supportive evidence from either a qualified medical or mental health professional or Iowa Vocational Rehabilitation Services.

A participant who has successfully completed a postsecondary educational program that provides less than a baccalaureate degree may be approved for further training if the participant meets one of the following criteria:

- The previous training is in an occupation that is outdated.
- The previous training is in a field where current labor market information or emergency business trends show little or no employment opportunity.
- The training requested is a progression in a specific career that moves a participant from entry-level positions to higher levels of pay, skill, responsibility, or authority.
- The participant's background makes employment in the area in which the participant is training impossible.
- Changes in the participant's physical or mental status make the past training no longer appropriate. The participant must provide supportive evidence from a qualified medical or mental health professional or Iowa Vocational Rehabilitation Services.

Students who are enrolled in an educational program leading to a degree beyond a bachelor's degree, and their families, are not eligible for FIP. This includes students who:

- Already possess a bachelor's degree and are now enrolled in a program for a master's degree, PhD, M.D., chiropractic, veterinary medicine, dentistry, or other advanced degree.
- Have not yet attained a bachelor's degree but who have been enrolled in an advanced educational degree program.

Procedure: Help a participant who desires training to improve their employability select training that is approvable. Include an approvable training plan in the FIA if the participant's postsecondary education evaluation demonstrates potential for success in the training other requirements in [Postsecondary Education And Training](#) are met.

Inform the participant's IM worker if you become aware that a FIP/PROMISE JOBS participant has been enrolled in a program leading to a higher degree than a bachelor's degree. The educational institution can verify program enrollment.

Nonapprovable Training

Legal reference: 441 IAC 93.8(4)

Policy: Only approvable training activities can be included in a participant's FIA.

The following training activities are not approvable:

- You determine through postsecondary educational assessment that the participant will be unlikely to complete the requested program successfully.
- The goal of the plan is a job paying less than minimum wage.
- The course or training is one that the participant has previously completed.
- Any course or training in a field in which the participant does not intend to seek employment after the training is completed. An exception may be made when the reason for not seeking employment is to receive further education when the education:
 1. Is a planned progression in a specific career path; and
 2. Will not lead to an advanced degree beyond a baccalaureate.
- Education in a field which the participant has failed to earn the grades required for admission. **NOTE:** This policy does not apply to participants under age 18 who are completing high school.

- Training that will not be completed until after the participant leaves FIP. Training programs that exceed the known length of time during which the participant will remain eligible for FIP assistance shall be approved only if:
 1. The time remaining in the training is minimal and tuition has already been paid.
 2. There is a reasonable plan for how the program will be completed without the assistance and support from FIP or PROMISE JOBS. A reasonable plan may include, but not be limited to, school loans, grants, and scholarships.
- Any course or training in a field in which the participant does not intend to seek employment after the training is completed. An exception may be made when the reason for not seeking employment is to receive further education when the education:
 1. Is a planned progression in a specific career path; and
 2. Will not lead to an advanced degree beyond a baccalaureate.
- Education in a field in which the participant will not be able to be employed due to known criminal convictions or founded child or dependent adult abuse.
- The training is in an occupational area where available labor market statistics or emerging business trends in the local area indicate that prospects are low for job availability and employment paying enough to lead to self-sufficiency for the family.
- Students who are enrolled in an educational program leading to a degree beyond a bachelor's degree. This includes students who:
 - Already possess a bachelor's degree and are now enrolled in a program for a master's degree, PhD, M.D., chiropractic, veterinary, dentistry, or other advanced degree.
 - Have not yet attained a bachelor's degree but who have been enrolled in an advanced educational degree program.

Inform the participant's IM worker if you become aware that a FIP/PROMISE JOBS applicant or participant is enrolled in a program leading to a higher degree than a bachelor's degree, as the student and the family are not eligible for FIP. The educational institution can verify program enrollment.

- A participant who already possesses a BS, BA, or similar degree wants additional college course work, unless the course work is to obtain a teaching certificate or to complete continuing education units and will not lead to a masters or other advanced degree. See [Approvable Training Activities](#) for when training may be approvable.

Procedure: Do not approve a training plan that includes nonapprovable activities. If a participant has a current approved training plan and for any reason, the training plan is now nonapprovable, cancel the current training plan and require the participant to renegotiate the FIA to include other activities. Use Issue Form 470-0602, *Notice of Decision: Services*. The participant will have the right to appeal this decision.

When evaluating whether requested training is in an occupational area where available labor market statistics or emerging business trends in the local area indicate low employment potential, use legitimate sources, such as but not limited to:

- IWD,
- Private employment agencies, or
- Local employers providing jobs paying less than minimum wage for which the education is being requested.

When a participant's requested training is nonapprovable due to low employment potential in the local area, make an exception and approve the training when:

- The participant has a job offer paying at least minimum wage before entering the training, or
- The participant is willing to relocate after training to an area where there is employment potential.

When a participant is willing to relocate to another area, check the IWD labor market statistics for the area to determine if the training can be approved. If needed, ask the participant to provide other documentation from private employment agencies, or employers in the area showing that there are jobs paying at least minimum wage for which training is being requested. Approve the training plan when you find potential for employment paying at least the minimum wage in the area where the participant will locate when the training meets all other requirements.

When a participant reports have a job offer paying at least minimum wage, ask the participant to provide documentation. If the participant provides documentation, approve the training plan when the training meets all other requirements.

When approving or denying a training plan for any reason, thoroughly document the basis for your decision in the case file. When denying a plan due to low employment potential in the local area, include the source of your labor market statistics information.

Include copies of this documentation with an appeal summary when a participant appeals:

- The contents of the FIA.
- The *Notice of Decision: Services* you issue to deny the vocational training plan.

Using Postsecondary Education in the FIA

Legal reference: 441 IAC 93.8(5)

Policy: Once a participant is approved for training, a training plan shall be developed and written into the participant's FIA. The training plan shall include:

- The participant's specific vocational goal.
- The approved educational activities.
- The hours of enrollment. Participants are encouraged to maintain as full an academic workload as is possible in order to complete their education in a timely manner. However, a person may choose to participate in education on a part-time schedule and include other activities such as employment, job-seeking skills, or other activities in the FIA.
- A date by which the participant expects to complete training. This end date depends on:
 1. Time frames specified for a program as established by the educational facility.
 2. Whether the participant is attending full-time or part-time.
 3. Problems or barriers to participation.
- The participant's requirement to provide verification of their actual hours of participation for each month on *Time and Attendance*, form 470-2617 by the 10th calendar day of the month following the month of participation.

Procedure: If needed, renegotiate the FIA to include the training plan. Notify the participant in writing of the appointment to renegotiate the FIA as described at [Written Notice to Participant](#). Allow the participant **at least 10 calendar days** from the date the notice is mailed or given to the participant to appear for the appointment.

Once you have verified actual hours of participation in postsecondary education training, report the actual hours of participation in class, labs, and supervised study time through entry in IowaWORKS. You may also report up to one hour of unsupervised study time for each hour of scheduled class time. See [Reporting Participation Hours](#) for limits and more information. Report any scheduled hours missed for an excused reason when allowable as described at [Excused Absence and Holiday Hours](#).

When participation in the training plan becomes an issue, refer to [Participation Issues Specific to Classroom Training](#) and [FIA Participation Issues](#). Determine if:

- The training plan should be canceled or
- The participant is choosing an LBP and you need to attempt to resolve the issue.

Use of Academic Probation

Legal reference: 441 IAC 93.8(8)

Policy: PROMISE JOBS may place a participant on academic probation for at least one term, or a comparable time limit appropriate to the educational program at the time the participant requests training as an FIA activity when:

- The educational evaluation identifies factors with the participant's ability or past circumstances that could make successful completion of the training difficult. In this situation, it may be appropriate to approve the training plan and place the participant on academic probation rather than denying the training plan.

For example, if the participant's motivation is high and changes in the participant's life situation indicate a realistic probability of success.

- The participant was previously unable to maintain the cumulative grade point average required by a training facility in training that is comparable to the training being requested.
- The participant enrolled but did not complete a previous education activity and did not have mitigating circumstances.

PROMISE JOBS may place a participant on academic probation for at least one term, or a comparable time limit appropriate to the educational program for approved training that is included in the FIA when at the end of a term, or of a comparable period, the participant is receiving less than a 2.0 grade point average (or less than a higher average when required by the specific training facility or curriculum).

PROMISE JOBS must inform the participant in writing of imposition of academic probation and specific expectations.

PROMISE JOBS must cancel the training plan if the participant does not meet the specified expectations by the end of the academic probation period and the participant does not have mitigating circumstances.

Procedure: Inform the participant in writing of placement on academic probation as described at [Written Notice to Participant](#). Include the beginning and ending date of the probation period, clearly specify the expectations to be accomplished by the end of the period and explain that the training plan may be canceled if the participant does not meet the expectations by the end of the probation period.

Reevaluate the participant's progress at the end of the probation period to determine continued eligibility for participation in education. Use the same type of information used to conduct the original educational evaluation. Proceed as follows depending on the results of the evaluation:

- Remove the participant from academic probation as the participant shows satisfactory performance by receiving at least a 2.0 grade point average or a higher average as required by the specific training facility or curriculum.
- Continue probation if the participant is receiving less than the required grade point when reevaluation indicates that education remains appropriate when:
 - The participant has mitigating circumstances such as:
 - Temporary barriers such as illness or family emergencies interfered with successful participation and these have either been resolved or the participant is making good progress at resolving them.
 - The participant reveals long-term barriers to successful participation and the participant may be able to achieve satisfactory performance with the implementation of accommodations.
 - The counselor or the lead instructor in the educational program verifies that there is an excellent likelihood the student will raise the grade point to the acceptable level in the next term or a comparable time limit appropriate to the educational program.
- Cancel the participant's training plan when the participant has failed to maintain or improve to the required grade point average and reevaluation indicates no mitigating circumstances as described above. See [Termination of a Training Plan](#) for more information.

Supportive Payments for All Postsecondary Training

Legal reference: 441 IAC 93.8(6)

Policy: Eligibility for PROMISE JOBS supportive payments for education and training begins with the date when the participant begins training under an approved plan and is terminated when the training plan is either completed or cancelled. If a participant is already enrolled in training prior to being referred to PROMISE JOBS, or enters training prior to having an approved training plan, supportive payments will be provided beginning from the date the training plan is approved and included in the FIA, not the date of enrollment.

Each participant in postsecondary training is limited to 24 fiscal months of PROMISE JOBS payment of expenses needed for participation. The 24 fiscal months do not have to be consecutive. Participants **may** continue to include postsecondary training in their FIA after their period of funding limits has ended. They must demonstrate ability to cover the expenses of the plan through other resources.

For CCA, participants are limited to 24 fiscal months for participation in postsecondary training. CCA received while referred to PROMISE JOBS and CCA issued by HHS on or after March 1, 2009 counts towards the 24 month limit.

Time spent in high school completion, high school equivalency, adult basic education, or English as a second language does not count toward the 24-month limit.

When more than one facility offers a particular program, payment is limited to the amount required to attend the nearest educational facility except when attending a facility that is farther away will allow the family to reach self-sufficiency earlier.

The following sections give policy information on the education and training supportive payments:

- [Child Care Assistance](#)
- [Transportation](#)
- [Training Expenses](#)
- [Direct Education Costs](#)
- [Unallowable Expenses](#)
- [Disposal of Supplies Upon Plan Termination](#)

Procedure: When applying the 24 fiscal month limit, count fiscal months as follows:

Fiscal months have starting and endings dates that may fall within two adjacent calendar months but shall only count as one month. Begin counting fiscal months starting on the first calendar day that a person needs care and continue up to the same calendar day of the next month.

EXAMPLE: August 28 through September 27 = 1 fiscal month.

Continue to count fiscal months using these dates for the remainder of the training term. Begin a new fiscal month period at the beginning of each training term.

Comment:

1. One semester scheduled from August 26 through December 20 is counted as a total of four fiscal months: August 26 through September 25 = 1 fiscal month September 26 through October 25 = 1 fiscal month October 26 through November 25 = 1 fiscal month November 26 through December 25 = 1 fiscal month Total = 4 fiscal months

2. Two semesters that are scheduled from August 26 through December 20 and from January 13 through May 9 total eight fiscal months. If the parent does not attend summer school, count no additional fiscal months until the fall semester begins.

Child Care Assistance

Legal reference: 441 IAC 93.8(6)

Policy: Participants with an approved training plan may be eligible for CCA for up to 24 months when needed to attend training.

Procedure: Approve payment for CCA needed to attend training for up to 24 fiscal months. Count all CCA issued by PROMISE JOBS and by HHS towards the 24 fiscal month limit. Do not count any CCA payment issued by HHS prior to March 1, 2009.

Approve CCA before the start of training. Use form 470-4558 or 470-4558(S), *Notice of Decision: Child Care*, to approve CCA through entry in KinderTrack. Authorize a CCA payment after the provider has provided care and submits an attendance sheet to bill for the care.

See [Child Care Assistance](#) and [13-G Child Care Assistance](#) for more information.

Child care assistance payments for any missed days of training may be considered an overpayment. See 13-G, [Overpayment Recovery](#) for more information.

Transportation

Legal reference: 441 IAC 93.8(6)

Policy: Participants with an approved training plan may be eligible to receive payments for up to 24 fiscal months of transportation needed to attend training.

Procedure: Approve transportation payments needed to attend training for up to 24 fiscal months.

Use PJCase to issue the transportation payment so that the participant receives the payment before the start of the training. **EXCEPTION:** Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having an SSN.

See [Supportive Payments: Transportation](#) for additional policies regarding transportation payments.

Training Expenses

Legal reference: 441 IAC 93.8(6)

Policy: Participants with an approved postsecondary education training plan may be eligible to receive payment to cover the costs of training expenses.

Policy: Use PJCase to issue payment to cover the cost of the following training expenses:

- Fees for school enrollment, school testing or school application, provided the fees are related to the training plan and the PROMISE JOBS worker approves them before they are incurred.
- Fees for educational grant or scholarship application. Since receipt of grants or scholarships will be needed to meet the client's educational costs, these are allowable costs provided the PROMISE JOBS worker approves them before they are incurred.
- Fees for certification and testing, provided the PROMISE JOBS worker approves them before they are incurred.
- Travel costs required for certification or testing, limited to the amount determined by policies described at [Transportation](#).
- Practicum expenses. When the curriculum of a course of study requires a practicum that is not available within driving distance of the participant's home, a \$10 per diem allowance is available to help with living costs. See [Practicum Living Costs](#) for additional information.

EXCEPTION: Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having an SSN.

Direct Education Costs for Short-Term Postsecondary Training

Legal reference: 441 IAC 93.8(6)

Policy: Participants with an approved short-term postsecondary training plan may be eligible for payment to cover the cost of direct education costs when needed to participate in the training plan. "Short-term" training is a program that takes less than 30 weeks to complete.

Procedure: Use PJCase to issue payment to cover the cost of the following training expenses:

- Tuition. Do not allow tuition supportive payments for short-term training of less than 30 weeks that exceeds the rate charged by the state of Iowa community college nearest to the client's home which offers a program comparable to the one in which the client plans to enroll.

- If a community college in Iowa does not offer a comparable program, do not allow a maximum tuition payment that exceeds the Iowa resident rate charged by the out-of-state community college located nearest to the client's home.
- Fees, including graduation.
 - Books required for participation.
 - Basic school supplies. Allow a standard allowance of \$10 per term or actual cost, whichever is higher, for basic school supplies. Require verification by receipt before authorizing a claim for actual costs higher than \$10. For more details, see [Fees, Books, and Supplies](#).
 - Specific supplies, including tools, and required uniforms, related to obtaining credit for a course and required of all students in a course.
 - **Exception:** Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having an SSN.

Unallowable Expenses

Legal reference: 441 IAC 93.11(4)

Policy: The following items are not approvable training expenses:

- Rings, pins, pictures, rental of graduation gowns.
- Elective courses which require expenditures for special equipment in addition to books, for example, photography or art supplies, or field trips.
- Any other item not required to complete training for a vocational goal.

When a participant has enrolled in or completed entrepreneurial training, PROMISE JOBS funds cannot be used to purchase supplies to enable a participant to being a private business.

Procedure: Although participants may enroll in elective courses at their own cost, do not approve a plan that contains a request for elective courses or related expenditures that are not required for admission to a vocational program or to complete training for a vocational goal.

Do not issue a payment for an expense that is not approvable.

Disposal of Supplies Upon Plan Termination

Legal reference: 441 IAC 93.8(6)

Policy: Participants who successfully complete their training plan may keep any books or supplies that were purchased with PROMISE JOBS funds.

Participants who do not complete their training program and do not obtain training-related employment within 60 days of leaving training must return all reusable supplies purchased by the program, including tools and books but not clothing.

When tools are not returned, consider the amount of the PROMISE JOBS payment to be an overpayment unless the participant verifies theft of the tools through documentation of timely report to a law enforcement agency.

Procedure: Reuse any returned supplies when possible.

PROMISE JOBS may donate to nonprofit organizations any returned supplies that you determine are not usable by the program.

Recover the cost of any supplies that are not returned by participants who do not complete their training or do not obtain training related employment within 60 days of leaving training.

Termination of a Training Plan

Legal reference: 441 IAC 93.8(8)

Policy: The participant's training plan shall be canceled if after academic probation the participant has failed to maintain at least a 2.0 grade point average or a higher average required by the specific training facility or curriculum, and reevaluation indicates no mitigating circumstances.

Procedure: Monitor academic progress for each participant. Apply policies at [Use of Academic Probation](#) and allow a school term of probation when appropriate. Terminate the training plan when you have documented that a participant is unable to achieve the cumulative grade point average required by the training facility after the period of probation.

Consider terminating a training plan when you have documented that a participant's continuation in a training plan is detrimental to family functioning. You and the participant make that decision.

In either circumstance, take the following actions:

- Terminate the training plan, using 470-0602, *Notice of Decision: Services*.
- At the same time, offer the participant, in writing, the opportunity to renegotiate and amend the FIA.

NOTE: These policies do not apply to parents under age 18 who are participating in high school completion or an equivalency classes.

Participation Issues Specific to Postsecondary and Basic Education Training

Legal reference: 441 IAC 93.8(9)

Policy: Participants with an approved postsecondary or basic education plan in their FIA are considered to have chosen an LBP when:

- The participant fails to maintain education activities as specified in the FIA or follow training plan requirements without good cause.
- Participant misuses supportive payments to the extent that the training plan is no longer achievable.

Procedure: When participation in a training plan that is included in the FIA becomes an issue as described at [FIA Participation Issues](#), attempt to resolve the issue as described in that section.

Potential issues specific to classroom training include:

- The participant fails to appear for two consecutive scheduled appointments with the worker without good cause. Attempt to resolve the issue at the first occurrence by sending a written reminder letter, stating that the failure to appear seems to indicate choice of the limited benefit plan. Follow all policies under [Written Notice to Participant](#).

Communication example:

You did not attend your appointment on xx/xx/xx to talk about your attendance in classes. It appears that you are choosing the limited benefit plan by not following the training plan in your family investment agreement.

I have set up another appointment for you so you can continue with the steps in your family investment agreement. If you do not attend the appointment, we will begin your limited benefit plan. The attached appointment letter explains the limited benefit plan.

If you have changes or problems in your life that make it hard for you to follow your training plan and family investment agreement, you need to tell me. We can talk about them at your appointment and decide if your family investment agreement should be changed to fit your situation better.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

- The participant fails to cooperate in providing information concerning grades, academic progress, financial resources, change of address, change of telephone number, or change of family composition.

Attempt to resolve the issue at the first occurrence by sending a written reminder letter, stating that the failure to provide information seems to indicate choice of the limited benefit plan. See [Written Notice to Participant](#).

When you have an ongoing arrangement with the participant to provide recurring records, you do not need to send a written reminder each time that the participant fails to provide the information in the agreed-upon manner.

Always provide one clear written warning that you will not do so, even if you have given an oral explanation during a face-to-face meeting. Examples of recurring records are grade records, documentation of school enrollment, and financial resource information.

Communication example:

You did not provide the mid-term grade report that we need to tell whether you will be able to continue in your training plan. We should have had it by xx/xx/xx because you agreed to provide it within ten days after the school issues it. Please provide it by xx/xx/xx. If we do not receive it, we will know you are choosing the limited benefit plan.

Please understand that I will not send a written reminder about your grade every semester. If you have a reason why you can't get grade records here on time, be sure to contact me at once. We will help you with any problems you are having. If we don't receive the grade records and we don't hear from you, we will know that you are choosing the limited benefit plan.

If you have changes or problems in your life that make it hard for you to follow your training plan and family investment agreement, you need to tell me. We can talk about them and decide if your family investment agreement should be changed to fit your situation better.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

- The participant fails to cooperate in providing verification of hours of attendance in an educational program. See [Time and Attendance](#).

Attempt to resolve the issue at first occurrence by sending a written reminder letter, stating that the failure to provide verification of hours of attendance seems to indicate choice of the limited benefit plan.

See [Written Notice to Participant](#). You do not need to send a written reminder to participants each time that they fail to provide the agreed-upon verification of time and attendance. Always provide one clear written warning that you will not do so, even if you have given an oral explanation during a face-to-face meeting.

Communication example:

You did not provide the verification of your school time and attendance that you are required to provide each month, ten days after the end of the calendar month. We should have had it by xx/xx/xx. Please provide it by xx/xx/xx. If we do not receive it, we will know you are choosing the limited benefit plan.

Please understand that I will not send a written reminder every month. If you have a reason why you can't get the time and attendance here on time, be sure to contact me at once. We will help you with any problems you are having. If we don't receive the time and attendance records and we don't hear from you, we will know that you are choosing the limited benefit plan.

If you have changes or problems in your life that make it hard for you to follow your training plan and family investment agreement, you need to tell me. We can talk about them and decide if your family investment agreement should be changed to fit your situation better.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

- The participant misuses supportive payments to the extent that the training plan is no longer achievable.

When this occurs, consider the participant to have chosen an LBP. Use a written letter to clearly establish the LBP choice, to attempt to identify barriers, and to offer supervisory intervention. You may either schedule an appointment to discuss the issue or allow the person at least 10 calendar days to respond to the letter.

- The participant knowingly provides receipts or any other written statements that have been altered, forged, or, in any way, are not authentic.

When this occurs, consider the participant to have chosen an LBP. Use a written letter to clearly establish the LBP, to attempt to identify barriers, and to offer supervisory intervention. You may either schedule an appointment to discuss the issue or allow the person at least 10 calendar days to respond to the letter.

Communication example:

We have received information that leads us to believe that the receipt for educational supplies from the Good Office Supplies Store on xx/xx/xx has been altered to an amount larger than you actually paid for the school supplies. People who provide altered, forged, or other inauthentic receipts or statements to PROMISE JOBS are choosing the limited benefit plan.

If you can verify that our information is incorrect, please do so by xx/xx/xx.

If our information is correct and if you can provide an authentic receipt, personally verified by employees of the Good Office Supplies Store, by xx/xx/xx, we will be able to authorize your supportive payment at the correct amount. If we do not get it, we will know that you are choosing the limited benefit plan.

If we again receive altered, forged, or other inauthentic receipts or statements from you, we will consider that you have chosen the limited benefit plan without further warning.

If you have changes or problems in your life that make it hard for you to follow your training plan and family investment agreement, you need to tell me. We can talk about them and decide if your family investment agreement should be changed to fit your situation better.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

- The participant withdraws from courses or from the training program without prior approval from PROMISE JOBS.

When this occurs, consider the participant to have chosen an LBP. Use a written letter to clearly establish the LBP choice, to attempt to identify barriers, and to offer supervisory intervention. You may either schedule an appointment to discuss the issue or allow the person at least 10 calendar days to respond to the letter.

Do not use this policy if the participant is able to reinstate the course or the training program. Follow policies at [Problems With Participation](#) and [Barriers to Participation](#). Offer to renegotiate and amend the FIA if the participant provides acceptable evidence of a problem with participation or a barrier to participation.

Communication example:

The community college told us that you dropped out of your nursing training program three weeks ago. It is too late to reinstate your nursing program. It appears you are choosing the limited benefit plan because you dropped out of the training without PROMISE JOBS approval.

If you have a problem with participation or a barrier to participation that caused you to drop out without telling us, you can tell me about it at the appointment shown on the attached notice. If we are not able to resolve this issue, we will know that you are choosing the limited benefit plan.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

Parenting Skills Training

Legal reference: 441 IAC 93.9(1)

Policy: Parenting skills training includes activities that strengthen a participant's ability to be a better parent. Parenting skills is approvable training under PROMISE JOBS as an FIA option.

Procedure: Include parenting skills training in the FIA for those who choose participation in parenting skills training as an FIA activity and for those who are required to attend parenting skills training due to their age.

Help participants to select a parenting skills training provider and to schedule the hours of training to avoid conflict with hours of employment, high school or high school equivalency classes, or other training.

The following sections address:

- [Specific approvable providers](#)
- [Other approvable providers](#)
- [Duration for parenting skills training](#)

- [Supportive payments for parenting skills training](#)
- [Training for parents aged 20 or older](#)
- [Training for parents aged 19 or younger](#)
- [Using parenting skills in the FIA](#)

Specific Approvable Providers

Legal reference: 441 IAC 93.9(1)“c”

Policy: The following sources are approvable providers for parenting skills training:

- High school departments of family and consumer sciences that offer child development, family relationships, or parenting classes.
- Alternative high school programs for pregnant and parenting teens.
- Community colleges, other associate degree institutions, and baccalaureate degree institutions that offer child development, family relationships, or parenting classes.
- Area education agencies.
- Child abuse prevention programs.
- Child and adult food program sponsors.
- Child care resource and referral agencies.
- Family resource centers.
- Maternal and child health centers.
- FaDSS program grantees.
- Other family development providers.
- Head Start, Head Start Parent and Child Centers, and Early Head Start programs.
- Iowa State University Extension services (such as but not limited to the “Best Beginnings” program).
- Rehabilitative treatment services such as family centered services and family preservation as described in [18-C\(3\)](#).
- Private nonprofit social service agencies.
- Young parent support and information organizations.
- You do not need to inquire into the parenting skills curriculum or course content for any of the providers above.

Procedure: Because funding for the cost of parenting skills training is very limited, help participants select providers who can provide training at no cost whenever possible. Remember that supportive payments are not available for parenting skills training when a source is available at no cost.

EXCEPTION: If the participant can include parenting skills training with other courses in an approved short-term classroom training plan of less than 30 weeks, you may authorize payment for education costs, child care, and transportation that are related to parenting skills training. In this situation, you do not need to require the participant to select a free provider. Review the list of approvable providers with the participant. If the participant is already working with any of these providers, help them to continue their association and use it to meet the parenting skills requirement.

Establish working relationships with any of the above entities in your service area.

It is very important that the mandatory PROMISE JOBS requirement for parenting skills training should **not** disrupt relationships between teenage participants and other entities that are serving them.

Other Approvable Providers

Legal reference: 441 93.9(1)“d”

Policy: Other providers of parenting skills training are approvable so long as they offer training within the time frames described under [Duration for Parenting Skills Training](#), and have five of these six elements:

- Child growth and development.
- Child health and nutrition.
- Child safety.
- Positive discipline.
- Relationships.
- Life skills.

When providers from the approved list are not available in your service area or in an area accessible to the participant, or a participant prefers a provider that does not appear on the approved list, ask a potential provider to give you a copy of the curriculum in use.

If five of the above elements are present, you may approve the provider. Include a copy of the approved curriculum in the participant case file.

Duration for Parenting Skills Training

Legal reference: 441 IAC 93.9(1)“f”

In the FIA, use a specific duration for parenting skills training.

- Ask the participant and the training provider to decide between them how long the training will be required in the FIA. This time must fit within the limits described below.

- Consult with the participant and the provider to help them design a written agreement that designates the period during which the parenting skills training requirement will be fulfilled. Be sure the participant, the provider, and you each receive a copy of the agreement.
- Use form 470-0602, *Notice of Decision: Services*, from HHS regarding services such as family centered services and family preservation (as described in [18-C\(3\)](#)) that contain a specific period of service in place of a written agreement between the participant and the provider.
- Include the duration in the agreement or notice of decision in the FIA.

Participants who fail to carry out this step in the FIA shall be choosing the LBP. Require participants and parenting skills training providers to use the following limits when developing the agreement to determine how long parenting skills training must be included in the FIA and the maximum time that supportive payments may be available.

<u>Provider</u>	<u>Time Requirements</u>
High schools, Alternative high schools	A minimum of one semester and a maximum of two semesters
Postsecondary institutions	One semester or two quarters
HHS family-centered services; HHS family preservation	The specific period of service indicated in the notice of decision
All other providers	A minimum of six contact hours or six weeks, whichever comes first, and a maximum of 26 contact hours or six calendar months, whichever comes first

These limits do **not** mean that you should ask parents which they would prefer, six weeks or six months of training. Help the participant to choose a provider, considering resources available in the service area, availability of no-cost providers, hours and time of day the participant has available for parenting skills training.

Determine the length of the parenting skills training in the FIA by the usual program services of the parenting skills provider and the above time limits. EXAMPLE:

- Some programs are planned for six contact hours or six weeks, whichever comes first. If this is the only program available, it can be used to meet the mandatory parenting skills training requirement for a parent aged 19 or younger.
- Programs that have long-term relationships with young parents will probably use the six-month maximum, unless the provider and participant feel that the parenting skills training can be completed in less time.

After the parenting skills training is completed, providers and their participants are free to continue their relationship as long as they wish. However, supportive payments will not be available and PROMISE JOBS will not monitor the participation after the designated period in the FIA.

Supportive Payments for Parenting Skills Training

Legal reference: 441 IAC 93.9(1)“e”

Policy: Parenting skills training participants may be eligible for CCA and transportation supportive payments if needed for participation in parenting skills training and not available from another source.

Parenting skills training participants may be eligible for a supportive payment to cover the cost of tuition, fees, books and supplies only when training is not available at no cost from a source in the service area.

Procedure: Use PJCase to issue transportation supportive payments to participants prior to the start of parenting skills training.

Use PJCase to issue payment for the cost of tuition, fees, books and supplies only when:

- Parenting skills training is not available at no cost in the service area.
- The participant enrolled in parenting skills training along other courses in an approved short-term classroom training plan of less than 30 weeks.

EXCEPTION: Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having an SSN.

Approve CCA before the start of parenting skills training. Use form 470-4558 or 470-4558(S), *Notice of Decision: Child Care*, to approve CCA through entry in KinderTrack. Authorize a CCA payment after the provider has provided care and submits an attendance sheet to bill for the care.

See [Supportive Payments: Transportation](#) and [Child Care Assistance](#) for more information on authorizing transportation and CCA.

Do not authorize supportive payments for any period that extends beyond the designated period for parenting skills training included in the FIA. If the parent chooses to continue a relationship with the provider of parenting skills training after reaching the end of the designated period in the FIA, PROMISE JOBS has no responsibility for supportive payments for the parenting skills training.

EXCEPTION: If completion is delayed by acceptable problems with participation or barriers to participation, renegotiate and amend the FIA, based on a new written agreement between the participant and the provider to establish a new duration to be used in the FIA.

Parents Aged 20 or Older

Legal reference: 441 IAC 93.9(1)

Policy: Parents who are aged 20 or older when the FIA is signed may include parenting skills training in the FIA as long as the parent is active in at least one other PROMISE JOBS component. Parents aged 20 or older who do not participate in parenting skills training as described in their FIA have chosen the LBP, unless the parent is experiencing problems or barriers to participation.

Procedure: Follow the procedures under Including Parenting Skills in the FIA.

Follow all policies at [FIA Participation Issues](#) when a participant's FIA includes parenting skills training and the participant is not participating in parenting skills training as stated in their FIA.

Parents Aged 19 or Younger

Legal reference: 441 IAC 93.9(1)"b"

Policy: Parents who are aged 19 or younger, or "teen parents" when the FIA is signed are required to include parenting skills training in the FIA.

While meeting the parenting skills training requirement, teen parents must also meet all other PROMISE JOBS and FIA requirements that apply to them as described at [FIA Options for FIA-Responsible Persons Aged 19 or Younger](#). This includes high school completion or equivalency classes, and FIA options that are equivalent to the level of commitment required for full-time employment or significant so as to move toward that level.

Procedure: Follow the procedures under [Including Parenting Skills in the FIA](#).

Follow all policies at [FIA Participation Issues](#) when a participant's FIA includes parenting skills training and the participant is not participating in parenting skills training as stated in their FIA.

Using Parenting Skills Training in the FIA

Legal reference: 441 IAC 93.9(1)

Policy: The FIA needs to be written to include specific plans for parenting skills training and needs to identify the training provider's name and beginning and ending dates of the training. The training may be scheduled in the future to accommodate availability of provider resources.

Procedure: Help participants select a provider with parenting skills training that will not interfere with education, job search, employment, or other FIA activities. Include parenting skills training as a step in the FIA.

When writing the initial FIA for a teen parent who reports they have satisfactorily completed parenting skills training, ask the teen parent to provide documentation. Include the requirement to provide documentation in the FIA. If the teen parent provides documentation to show they have satisfactorily completed parenting skills training from an approvable provider and the minimum time frames have been met as described at [Duration for Parenting Skills Training](#), do not require the parent to include parenting skills training in their FIA.

If a teen parent is already participating in a parenting skills training program at the time the FIA is signed, allow the parent to continue in the program if the provider is approvable and the minimum and maximum time frames will be met. Require the participant to provide a written statement from the provider that designates the period during which the parenting skills training will be completed. Include parenting skills training in the FIA for the designated period.

Whenever possible, help participants combine parenting skills training with their high school completion or short-term classroom training. If they are working with a young parent support group, participation may take place during the evening hours with child care provided on site.

Help the participant to write the FIA to include specific plans for parenting skills training, with provider name and beginning and ending date.

Help the participant to schedule the training as soon as is compatible with the circumstances of the family, the other activities in the FIA, and the availability of provider resources, unless waiting list restrictions apply. See [Waiting Lists](#).

Require parents who sign the FIA while aged 19 and younger and who become age 20 before the training is completed to honor the duration of the parenting skills training in the FIA, as long as their FIA responsibility continues.

If a break in FIP assistance of more than one month occurs so that a new FIA is needed, the parent who has turned age 20 may choose whether or not to complete the parenting skills training.

Ask the parenting skills training provider to notify you in writing when participation is not satisfactory or when the participant has abandoned the training.

Consider that parents aged 19 or younger have chosen the LBP in the following circumstances:

- They do not include parenting skills training in the FIA.
- They do not participate in parenting skills training described in the FIA.

When a participant aged 19 or younger becomes FIA-responsible while receiving FIP and refuses to include parenting skills training in the FIA, follow procedures at [FIP Participants Whose Referral Status Changes to FIA-Responsible](#).

When you receive a written notice from the provider that the participant is not satisfactorily participating in parenting skills training as stated in their FIA or has abandoned the training, follow all policies at [FIA Participation Issues](#).

Be sure the provider appears under [Specific Approvable Providers](#) or meets the requirements under [Other Approvable Providers](#). Determine the remaining training time to be included in the FIA as described under [Duration for Parenting Skills Training](#).

Supportive Payments

Legal reference: 441 IAC 93.11(239B)

Policy: You are responsible for helping the participant to arrange for child care, transportation, and other supportive services, as required to facilitate the participant's successful participation in PROMISE JOBS activities.

PROMISE JOBS participants are eligible for supportive payments needed for participation in FIA activities, subject to the limits in this chapter, and when:

- The participant is receiving FIP and has signed an FIA or,
- The participant has reapplied for FIP and needs supportive payments to complete 20 hours of activity to end a subsequent LBP.

An **essential** part of arranging for PROMISE JOBS services is the payment of allowable expenses that are needed to make participation possible. Follow the policy for the specific component or activity when determining a participant's eligibility for supportive payments.

PROMISE JOBS supportive payments are issued on the participant's FIP electronic access card (EAC) card, also known as a debit card except when:

- The payee requests direct deposit to the payee's account at a financial institution.
- The payee does not have a social security number.
- The payee is not the case name (head of household) for the case.

When an electronic access account is set up for a person who has not previously had an account, the electronic access card is mailed by the evening of the next working day after the ABC system action that caused the account to be set up. The participant should expect to receive the card about seven to ten days later.

PROMISE JOBS supportive payments will be available in the participant's EAC by noon of the day that is four working days after the date the action was taken in the PJCase system.

Payees who do not have a social security number or who are not the case name receive any PROMISE JOBS supportive payments as a warrant.

Refer to [4-H](#) for more information regarding the FIP EAC card and FIP warrants.

Procedure: Issue supportive payments monthly or as needed and document each issuance in the case file narrative. Use PJCase to issue needed supportive payments other than CCA.

Exception: Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due not having an SSN. Use KinderTrack to approve needed CCA.

When issuing payment in PJCase, PJCase sends form 470-0602, *Notice of Decision: Services*, to notify the participant of the issuance. A copy of the notice is also sent to the HHS local office to be filed in the participant's FIP case record. See [14-O, PJCase System](#) for entry instructions.

Approval of CCA in KinderTrack generates form 470-4558 or 4558(S), *Notice of Decision: Child Care*.

Supportive payments may be issued directly to the participant, service provider, or retailer except as follows:

- Make payment directly to the child care provider.
- Make payment for tuition, fees, books, and supplies directly to the training facility. See [Child Care Assistance](#) and [Education Expenses](#) for more information on payment to providers of these supportive services.

The following sections address:

- [Payments for birth certificates](#)
- [Transportation](#)
- [Child Care Assistance](#)
- [Payments for education expenses](#)

Birth Certificates

Legal reference: 441 IAC 93.11(5)

Policy: Payment may be made to cover the cost of obtaining a birth certificate when the participant needs the birth certificate to complete the IWD registration process.

Procedure: Use PJCase to issue payment to cover the costs of obtaining a birth certificate (including the costs of translation), when the participant needs the birth certificate to complete the IWD registration process.

Transportation

Legal reference: 441 IAC 93.11(3)

Policy: Participants are eligible for a supportive payment to cover the cost of transportation needed to participate in FIA activities, except for orientation, assessment activities that occur on the same day as orientation, and employment.

Transportation must be issued before the first scheduled day of participation in an activity. For participants in the same activity for more than one month transportation payments must be issued before the first day of the month of scheduling participation except as described at [Monthly Transportation Payments](#).

Procedure: Authorize a transportation payment for each day of participation, if transportation is required for participation in a PROMISE JOBS activity.

EXCEPTION: Do not authorize a transportation supportive payment:

- For orientation.
- For assessment activities that occur on the same day as orientation.
- For hours of employment. Employed participants are entitled to the FIP work expense deduction.

Issue payment monthly at the start of each month of participation or when participation begins, whichever is earlier. Issue the transportation payment so that the participant receives the payment before starting the activity.

Base transportation payment on the individual circumstances of each PROMISE JOBS participant. Include roundtrip transportation for the participant and child to get to and from a child care site as well as the PROMISE JOBS activity, when this is necessary. No maximum or minimum payment is established. A participant who lives very close to the PROMISE JOBS activity and has no need for transportation for child care purposes may not need a transportation payment.

Apply the principle of “required for participation in a PROMISE JOBS activity,” as well as all other PROMISE JOBS policies, when looking at unusual circumstances of participation. In addition, apply the principle of assisting PROMISE JOBS participants to move as quickly as possible toward self-sufficiency.

For example, it may be the best use of PROMISE JOBS funds to pay a transportation payment for night classes if it will shorten participation by a semester. On the other hand, it would not be necessary to attend a night class if the same class could be taken during daytime hours of a later semester that the participant must have to complete other requirements.

Two members of the same household attending the same activity with identical schedules do not need two transportation supportive payments. However, an academic need for different schedules or child care transportation problems might cause a need for payment for each participant. If parents are able to avoid the need for additional child care units by using different schedules, two transportation supportive payments would be appropriate.

As another example, consider a participant who has chosen training as a licensed practical nurse. If the program is available near the participant’s home, but an earlier opportunity to enroll exists at a facility farther away, the transportation payment to cover the greater distance is a good investment.

NOTE: It is appropriate to deny a request for training at a distant site if the same program is available at a location closer to the participant’s home.

Procedures for Issuing Transportation Payments

Legal reference: 441 IAC 93.11(3)

Procedure: Issue the necessary transportation supportive payment before the initial date of participation in any given component. Issue subsequent monthly transportation supportive payments so that the participant receives the payment before the first day of that month.

Use PJCase to issue a payment to cover the cost of transportation. Document each authorization in the case file narrative.

EXCEPTION: Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having an SSN.

Document the circumstances that support your decisions on the amount of the transportation supportive payment. This documentation should appear in the case file narrative, unless there are other documents or forms that clearly illustrate the reason for the decisions.

Payment for Public Transportation

Legal reference: 441 IAC 93.11(3)

Policy: A payment may be made to cover the cost of using public transportation for those who use public transportation.

Procedure: For those who use public transportation, base the payment on the normally scheduled days of participation in the PROMISE JOBS activity for the period covered by the payment. Use the rate schedules of the local transit authority to the greatest advantage, including use of weekly and monthly passes or other rate reduction opportunities.

Use weekly and monthly passes to the participant's advantage. If such passes are time-limited, they may not be compatible with the policies of adjustment described at [Monthly Transportation Payments](#).

The participant may authorize payment of the transportation supportive payment directly to the public transportation provider. This applies to urban transit or rural transit authorities or other public entities that provide group transportation.

Ask the participant to provide a signed request. Following is a sample text for such a request:

Please pay my transportation allowance to the Local Government Trolley while I am attending HSED classes at My Area Community College. This will be in effect from __/__/__ until I finish my HSED, around __/__/__.

Take steps to ensure that the participant understands the periods to be covered by these arrangements and how to terminate the arrangements.

Payments for Private Transportation

Legal reference: 441 IAC 93.11(239B)

Policy: A payment may be made to cover the cost of using a private motor vehicle to attend FIA activities.

Procedure: Authorize a transportation supportive payment for participants who use private motor vehicles to attend PROMISE JOBS activities. This includes those who use a motor vehicle they operate themselves and those who hire private transportation.

Determine the payment by multiplying the following elements:

- Normally scheduled days of PROMISE JOBS activity in the participation period.
- Anticipated daily round trip miles in the participation period.
- \$0.30 per mile.

EXAMPLE: Days x miles x \$0.30 = monthly payment or payment for a short-term activity.

Transportation supportive payments will usually vary from activity to activity or from month to month depending on things like class schedules, location of the activity, etc.

Document the calculation of the transportation supportive payment for each month or for each period of participation. Make a notation in the case file narrative for each calculation for a payment. This will provide consistency among PROMISE JOBS offices.

Base anticipated daily round trip miles on participant's report and knowledge or your research about local circumstances. Accept participant declaration of the distance to be driven, unless you have personal knowledge that indicates a discrepancy.

You and the participant may select the method of establishing the anticipated miles to be used for the payment calculation. You can document a participant's verbal statement or you can accept a written statement.

If you use a response letter to participants, you may not require the participants to use that particular form in order to receive transportation supportive payments. You must accept an alternate method of reporting the mileage.

If you allow fewer miles than the participant claims, the participant may appeal the amount of the transportation supportive payment that you authorize.

When a participant wants to refuse a transportation supportive payment warrant because the amount is too small to be worthwhile, ask the participant to provide a written statement. The language should state that the person declines the payment and it is not required for participation in PROMISE JOBS. Provide a copy of the statement to the participant and keep a copy in the case file.

Monthly Transportation Payments

Legal reference: 441 IAC 93.11(3)

Policy: Monthly transportation supportive payments need to be issued prior to the start of the month of expected participation.

Procedure: Issue monthly transportation supportive payments in advance for each full calendar month of participation. Determine the amount using the policies described previously.

Issue transportation supportive payments for the first two months of an ongoing PROMISE JOBS activity such as classroom training in the amounts determined by the policies and formulas described previously.

For the third and following months, do not authorize the transportation supportive payment for a particular month until form 470-2617, *PROMISE JOBS Time and Attendance*, is received for the month before the month in which you are authorizing the transportation supportive payment.

EXAMPLE:

A transportation payment for May is normally issued after April 15 to be available to the participant by May 1. Do not authorize it until time and attendance verification for the month of March has been received in the PROMISE JOBS office.

Adjust the amounts of payments for the third and subsequent months of an ongoing activity by subtracting from the normally scheduled days the difference between the number of scheduled days in the month before the issuance month and the number of actual days attended in that month.

EXAMPLE:

A transportation payment based on 16 normally scheduled days of participation is authorized for October, issued in September. The participant does not attend two days of the PROMISE JOBS activity in October.

If ten days of participation are normally scheduled in December, calculate the transportation payment issued in November for December using eight days.

Remember to adjust payment for the next month of participation according to the mileage rate that is in effect for that month and year.

This adjustment is not possible in the last two months of an ongoing activity. Apply transportation overpayment provisions to transportation supportive payments in the last two months of an ongoing activity. (See [Transportation Overpayments](#).)

Below are examples for adjusting the amount of the payment for the third and following months. Examples:

PRIVATE TRANSPORTATION FOR CLASSROOM TRAINING

Ms. A is enrolled in classroom training and must drive 20 miles round trip each day. Classes are scheduled for four days per week, Monday through Thursday. She has only the fall and spring semester to complete.

A transportation payment of \$24 is authorized for the first month, which is January. It is issued before classes begin and covers four days to include registration activities and two days of classes.

A payment of \$108 is authorized for the second month, February, to be received before February 1. It covers 18 days of scheduled classes.

A payment for March is authorized on February 16, after the worker checked the *PROMISE JOBS Time and Attendance* form. It indicates that Ms. A attended all four of the scheduled days in January. The payment for March is \$96 for 16 days of scheduled classes.

A payment for April is authorized on March 18, after the worker checks the *PROMISE JOBS Time and Attendance* form. It indicates that Ms. A missed two days of classes in February. The two days of absence are subtracted from the 16 scheduled days in April. The payment for April is \$84 for $(16 - 2 =)$ 14 countable days.

A payment for May is authorized on April 19, after the worker checks the *PROMISE JOBS Time and Attendance* form. It indicates that Ms. A attended all 16 scheduled days in March. The payment for May is \$48 for six days of scheduled classes and two days of tests. May is the last month of the semester.

Ms. A continues in classroom training for the summer semester that begins in June. The process continues. Ms. A is scheduled to attend 17 days of classes in April but misses one day due to illness. The worker reduces countable days for June by the one day of absence in April.

If April were in Ms. A's final semester, this absence would not be taken into account by adjusting a monthly transportation payment. Instead, the worker would review the transportation overpayment policies to determine if an overpayment exists. Because Ms. A attended more than 75 percent of the scheduled days for April, no overpayment exists.

PRIVATE TRANSPORTATION FOR WEP COMPONENT

Mr. R travels 10 miles each day for three days per week to participate in the WEP. On his day of job search, his mileage will vary.

For January, he will travel 14 days at 10 miles per day or 140 miles for WEP. For job search, he anticipates he will travel four days at 15 miles per day or 60 miles. He will travel 200 miles total for January. On December 16, his worker authorizes a transportation payment of \$60 for January.

In February, Mr. R will travel 13 days at 10 miles per day or 130 miles for WEP. He anticipates that he will average five miles per day for his five days of job search or 25 miles. He will travel 155 miles total for February. On January 16, his worker authorizes a transportation payment of \$46.50 for February.

Because Mr. R was ill, his *PROMISE JOBS Time and Attendance* form shows he missed three days of work experience and one day of job search in January. He is scheduled for 12 days of WEP and four days of job search in March. He anticipates he will travel 5 miles per day for his four days of job search.

For March, he is eligible for a payment for nine days of WEP at ten miles per day and for three days of job search at five miles per day. The worker authorizes \$31.50 for March transportation.

Mr. R's February *PROMISE JOBS Time and Attendance* form indicates perfect attendance. For April, he will travel 14 days at 10 miles per day or 140 miles for WEP. He anticipates three days of job search at 60 miles per day or 180 miles, as he will be driving from LeMars to Sioux City to look for work. On March 18, the worker authorizes \$96 for April transportation.

Mr. R is offered a job starting April 1 and does not attend WEP that month. Because he entered employment, there is no overpayment for April transportation.

PUBLIC TRANSPORTATION FOR HSED COMPONENT

Ms. J attends HSED classes at the learning center four days per week. Weekly and monthly passes are time-limited. The bus fares are as follows:

\$1.50 per round trip

\$5.50 weekly pass

\$22.00 monthly pass

Since the cost of the monthly bus pass is four times greater than the weekly pass, there is only a small savings in purchasing the monthly bus pass. Because her children are frequently ill, it is to her greatest advantage to purchase the daily bus pass.

Ms. J is scheduled to attend classes 18 days in September. On August 18, her worker authorizes \$27 for September transportation.

She is scheduled to attend 16 days in October. On September 17, her worker authorizes \$24 for October transportation.

Ms. J is scheduled for 17 days of classes in November. Her September *PROMISE JOBS Time and Attendance* shows perfect attendance. On October 17, her worker authorizes \$25.50 for November transportation.

In October Ms. J's children get chicken pox. She misses two weeks of classes, as shown on her October *PROMISE JOBS Time and Attendance* report.

Ms. J is scheduled for ten days in December. Because she missed eight days in October, she is eligible for two days' bus fare. On November 15, her worker authorizes \$3 transportation payment for December participation in PROMISE JOBS.

Transportation Costs for Disabled People

Legal reference: 441 IAC 93.11(3)"c"

Policy: Participants with a mental or physical disability who require a mode of transportation other than a vehicle they operate themselves are eligible for a supplemental transportation payment when documented actual transportation costs are greater than transportation costs for using public transportation or a private motor vehicle.

Procedure: Authorize a supplemental monthly transportation payment for people who, due to a mental or physical disability, require a mode of transportation other than a vehicle they operate themselves. Disabled participants are eligible for payment of the supplemental monthly transportation payment when the following are true:

- Documented actual transportation costs are greater than transportation payment provided under these policies.
- Transportation is not available from a non reimbursable source.

Authorize supplemental payment to include the following:

- The actual costs of transportation by a public or private agency.
- The costs of transportation provided by private automobile for the actual charge up to a maximum of the rate per mile as described at [Payments for Private Transportation](#).

When a participant asks for the supplemental payment because of a need for a mode of transportation other than a vehicle operated by the participant, ask the participant to verify the need through an independent physician or psychologist or Iowa Vocational Rehabilitation Services.

Help the participant to present medical evidence of disability or incapacity by a letter from the physician or on *Report on Incapacity*, form 470-0447.

When a disabled or incapacitated participant is eligible for payment of transportation costs greater than a standard transportation payment, first issue the portion that represents the standard payment within normal time frames, using the allowances type 'A' code in PJCase for the transportation supportive payment.

Then issue the supplemental transportation supportive payment, i.e., that portion of actual cost which is greater than the standard allowance, using allowance type code 'L,' in PJCase, designated "transportation, supplemental disabled."

If verification of need and actual costs has been provided in time to meet normal time of issuance, make the entries for both the standard transportation supportive payment and the supplemental transportation supportive payment at the same time. If not, delay the entry for the supplemental transportation supportive payment until verification of need and actual costs is received.

Never delay or withhold the standard transportation supportive payment due to the participant's failure to document actual cost, to verify need, or to verify the amount of actual costs that exceeds the standard transportation supportive payment.

Transportation Payments for High School Students

Legal reference: 441 IAC 93.8(6)“c”(3)

Policy: Participants are not eligible for a transportation supportive payment when transportation to their activity is available from another source at no cost.

Procedure: When a PROMISE JOBS participant is enrolled in high school, do not allow a transportation supportive payment if transportation is available from another source at no cost. This occurs when the school district provides transportation or deems transportation unnecessary due to the proximity of the participant’s home to the school.

If child care needs make it impossible for the participant to use transportation provided by the school district, authorize a transportation supportive payment.

Transportation Overpayments

Legal reference: 441 IAC 93.11(3)

Policy: A transportation overpayment has occurred when the following are true:

- The participant attends none of the scheduled days of participation in a PROMISE JOBS activity. Consider the entire transportation payment as an overpayment.
- If a participant can be rescheduled for the activity within 90 days from the date the transportation payment was issued, recovery is not necessary, since the prior payment can be used. Initiate recovery of the overpayment when it becomes clear that subsequent participation in the activity is not possible. This may occur when the participant is ineligible for FIP. The participant is issued a transportation payment and begins a PROMISE JOBS activity, but attends less than 75% of the normally scheduled days of participation in one of the following situations:
 - The failure occurred in either of the last two months of an ongoing PROMISE JOBS activity.
 - The failure occurred in any transportation payment period of an activity that has not been used for payment adjustment, as described at [Monthly Transportation Payments](#).

Procedure: Recover the amount represented by the difference between the amount for the actual number of days attended and the amount for 75% of scheduled days.

EXCEPTION: A transportation overpayment does not occur for any month in which the participant leaves the PROMISE JOBS activity to enter employment.

When a participant takes a job, the participant often fails to attend some of the days of a PROMISE JOBS scheduled activity as a result. To assist in the transition to employment, no overpayment is considered to occur for any month in which the participant leaves a PROMISE JOBS activity to enter employment. This is true even if the participant attends none of the scheduled days for that month.

To determine whether a partial transportation overpayment has occurred for any period of any activity that cannot be used for payment adjustment, use the days of attendance for an activity as verified under the policies for [FIA Activities Provided by Other Providers](#).

Use the following chart to determine the number of days that represent 75% of the scheduled days for the allowance period:

Scheduled Days for Payment Period:	25	24	23	22	21	20	19	18	17	16	15	14	13
75% Participation:	19	18	17	17	16	15	14	14	13	12	11	11	10
Scheduled Days for Payment Period:	12	11	10	9	8	7	6	5	4	3	2	1	
75% Participation:	9	8	8	7	6	5	5	4	3	2	2	1	

EXAMPLE:

A participant in the final semester of a classroom training activity must drive 20 miles round trip each day and is scheduled to attend 17 days of classes in April. An April payment of \$102 is authorized.

1. The *PROMISE JOBS Time and Attendance* form for April reports two days of absence. The actual days of attendance for April are 15. This is more than the 13 days shown in the chart above. No overpayment has occurred.

2. The *PROMISE JOBS Time and Attendance* form for April reports five days of absence. The actual days of attendance for April are 12. This is one day less than the 13 shown in the chart above. An overpayment has occurred. The amount of payment for 13 days would be \$78; the amount for 12 would be \$72. The amount of the overpayment is \$6.
3. The *PROMISE JOBS Time and Attendance* form for April reports ten days of absence. The actual days of attendance for April are seven, six days less than the 13 shown in the chart preceding. An overpayment has occurred. The amount of payment for 13 days would be \$78; the amount for seven would be \$42. The amount of the overpayment is \$36.

Refer to [Recovery of PROMISE JOBS Supportive Payments Overpayments](#) for more information.

Child Care Assistance (CCA)

Legal reference: 441 IAC 93.11(2); Chapter 170

Policy: A participant is eligible for CCA when the participant needs child care to participate in any PROMISE JOBS activity other than orientation or assessment that occurs prior to signing an FIA providing:

- Payment is not specifically prohibited by other policies.
- Payment is not available from any other source.

CCA must be approved before the start of a PROMISE JOBS activity when the participant needs child care to participate in the activity.

Procedure: Use KinderTrack to determine eligibility for CCA.

PROMISE JOBS will determine eligibility for and manage CCA on a FIP case when the parent or relative is referred to PROMISE JOBS and the FIA includes a PROMISE JOBS activity in addition to employment. **EXCEPTION:** The HHS CCA unit will manage the CCA case when a parent is receiving CCA for a protective need for any of the children.

HHS CCA will manage the child care on a FIP case when the parent or relative is not referred to PROMISE JOBS **and** when the parent is referred to PROMISE JOBS and employment is the only FIA activity.

Use the following table to determine who manages the child care for a FIP case:

Situation	Responsibility
Employment is only FIA activity	HHS CCA Unit
Employment with at least one other FIA activity (no protective need)	PROMISE JOBS
Employment with at least one other FIA activity (with protective need)	HHS CCA Unit

When HHS is handling the CCA as employment is the only FIA activity and PROMISE JOBS adds another FIA activity, HHS CCA will transfer the CCA case to PROMISE JOBS except when the family has a protective CCA need.

If the other FIA activity ends, PROMISE JOBS will keep the CCA case.

When PROMISE JOBS is handling the CCA case and FIP eligibility ends, PROMISE JOBS will transfer the CCA case to HHS CCA if the family continues to have a CCA need.

The current worker needs to process any payment records generated after a transfer. The payment record will be listed under the program code originally authorized for the period. Sort payment records by worker name rather than by program code.

Contact your IWD Quality Assurance staff for CCA transfer procedures.

Processing CCA Applications on FIP Cases

Legal reference: 441 IAC 170.3(6)

Policy: Families may apply for CCA at the local HHS office in the county where the family resides or by completing an electronic application.

There are three forms a person can use to apply for CCA:

- Child Care Assistance Application, 470-3624 or 470-3624(S), or
- *Food and Financial Support Application*, 470-0462 or 470-0462 (Spanish) or
- *Child Care Assistance Review*, 470-4377 or 470-4377(S) when returned after the end of the certification period.

Families receiving FIP, including PROMISE JOBS participants, do not need to complete an application form to request CCA. A request for CCA is considered an “application”.

Procedure: PROMISE JOBS may need to process a CCA application form in the following situations:

- When a PROMISE JOBS participant files a CCA application form even though not required.
- When a person who is not a PROMISE JOBS participant files an application for FIP and CCA at the same time.

Participant Files Unnecessary Application

When a PROMISE JOBS participant files a CCA application form (even though not required), PROMISE JOBS needs to decide if the participant is reporting additional need on the application.

If the participant is not reporting an additional need, use KinderTrack to issue form 470-4558, *Notice of Decision: Child Care* to deny the application as unnecessary.

If CCA eligibility exists for an additional need:

- Update KinderTrack information to address any changes reported on the application, i.e., need and schedules, and issue form 470-4558, *Notice of Decision: Child Care* to approve the changes.
- Renegotiate the FIA if the need is for an approvable FIA activity and the FIA does not include the activity.

If the participant is reporting an additional need and CCA eligibility does not exist for the need, issue a *Notice of Decision: Child Care* in KinderTrack to deny the application for need not met.

See the [Determining Need](#) section for more information.

Joint FIP and CCA Application

When a person who is not a PROMISE JOBS participant applies for FIP and CCA at the same time:

- HHS will process the CCA application when the family does not have an FIA-responsible parent or relative (non-needy caretaker relatives, ineligible alien parents and SSI parents).

- HHS and PROMISE JOBS need to proceed as follows with all other FIP/CCA applications:

Person Meets CCA Need and Other Eligibility Criteria (income, etc.):

HHS should approve the application as soon as possible but no later than 30 days from the application date. HHS will not hold a CCA application waiting for FIP to be approved if eligibility can be established before the FIP decision. If FIP is approved after the CCA is approved:

- HHS keeps the KinderTrack case when the need is employment and the FIA includes no other activities or the need is protective.
- Otherwise, HHS will transfer the KinderTrack case to PROMISE JOBS.

If HHS is unable to approve CCA prior to FIP approval and the case will be handled by PROMISE JOBS (FIA includes activities other than work), HHS will:

- Call or email the PROMISE JOBS worker to discuss the pending application and transfer.
- Transfer the KinderTrack case to the PROMISE JOBS worker.
- Send the PROMISE JOBS worker the application, the applicant's work or training schedule, and the provider information, if available.
- PROMISE JOBS will approve the application for the CCA need as of the date of the CCA/FIP application or first day of need, whichever is later. PROMISE JOBS will not delay CCA approval while determining if the CCA need can also be an approvable FIA activity.

HHS CCA will hold the CCA application until the FIP determination is made.

- If FIP is denied, HHS will deny the CCA application for not meeting a need for service under CCA.
- **Work:** If FIP is approved and the CCA need is work, HHS will contact PROMISE JOBS to see if the participant has other FIA activities.
 - If there are no other FIA activities, HHS will process the application and retain the CCA case.
 - If there are other FIA activities PROMISE JOBS will process the application. HHS CCA will:
 - Call, email or fax the PROMISE JOBS worker about the transfer.
 - Transfer the KinderTrack case to the PROMISE JOBS worker (see above).
 - Send the PROMISE JOBS worker the application, the participant's work schedule, and the provider information, if available.
 - PROMISE JOBS will approve CCA as of the effective date of FIP eligibility or the first day of work, whichever date is later.

Person Meets CCA Need and Other Eligibility Criteria (income, etc.):

- **Job Search and Training:** If FIP is approved and the CCA need is job search or training, HHS will:
 - Call, email or fax the PROMISE JOBS worker about the transfer.
 - Transfer the KinderTrack case to the PROMISE JOBS worker.
 - Send the PROMISE JOBS worker the application, the participant's training schedule if applicable, and the provider information, if available.
 - PROMISE JOBS will approve or deny the child care need requested in the application and determine if child care will be needed for the FIA activities. If approving:
 - PROMISE JOBS will approve CCA for FIA activities as of the effective date of FIP eligibility or the first day of participation in the activity, whichever is later. Unless the person is reconsidering a subsequent LBP, PROMISE JOBS cannot approve CCA until the person has signed an FIA and is approved for FIP.
 - For persons in a subsequent LBP, PROMISE JOBS will approve CCA effective the first day of the 20 hours of FIA activity once the person has signed an FIA.

The following sections address:

- [Determining Need](#)
- [Eligible Child for CCA](#)
- [Two-Parent Households](#)
- [Effective Date of CCA Assistance](#)
- [Establishing the CCA Certification Period](#)
- [Approvable child care providers](#)
- [Notice of Decision: Child Care](#)
- [Unit of service](#)
- [Rate of payment](#)
- [Other payment policies](#)
- [Reviewing Eligibility](#)
- [Grace Period Following the Denial of a CCA Application](#)
- [Reinstatement After the Effective Date of CCA Cancellation \(Grace Period\)](#)

Determining Need

Legal reference: 441 IAC 93.11(2), 170.2(2)“b”

Policy: For CCA eligibility to exist, the child or parents of the child must have one of the following needs:

- Training
- Employment
- Child protection
- Medical absence or incapacity
- Seeking employment
- Participation in an approved PROMISE JOBS activity other than orientation

Procedure: HHS handles cases with a protective need.

When PROMISE JOBS is responsible for handling the CCA case, and the participant has a need for child care for an activity that is not an approvable FIA activity, PROMISE JOBS needs to determine if the activity is an approvable child care need according to CCA policy as described at [13-G, Need for Service, Training](#).

The following sections provide additional information.

Training

Policy: A participant who is in training that is not approvable

Procedure: When PROMISE JOBS is responsible for CCA for a family and PROMISE JOBS denies a parent’s or relative’s request to include training in the FIA as the training does not meet PROMISE JOBS requirements, PROMISE JOBS needs to determine if the training is approvable under CCA as described at [13-G, Need for Service, Training](#).

If the training is approvable under CCA, approve CCA for the units needed for the participant to attend the training and any additional units needed for FIA activities. Do not include the training in the FIA as an activity.

If the training is not approvable as an FIA activity or under CCA, PROMISE JOBS needs to:

- Issue form 470-0602, *Notice of Decision*, to deny the training plan as an FIA activity. Sample notice text follows: “Your request to include training in your family investment agreement and for transportation assistance to attend training is denied because...” and,

- Issue form 470-4558 or 470-4558(S), *Notice of Decision: Child Care* in KinderTrack to deny the application (or request) for CCA.

If the training is not approvable as an FIA activity but approvable under CCA, PROMISE JOBS needs to:

- Issue form 470-0602, *Notice of Decision*, to deny the training plan as an FIA activity. Sample notice text follows: “Your request to include training in your FIA and for transportation assistance to attend training is denied because...” and,
- Issue form 470-4558 or 470-4558(S), *Notice of Decision: Child Care* in KinderTrack to approve CCA.

In addition, when the training is not approvable as an FIA activity but approvable under CCA:

- Do not include the training in the FIA. The participant will need to participate in FIA activities that are approvable under PROMISE JOBS on a full-time basis unless barriers prohibit this level of involvement. “Full-time” is defined as an average of 30 hours per week. Work with the participant to select activities that can be scheduled outside of the training schedule.
- Do not require the participant to provide monthly time and attendance for training that is not approvable for PROMISE JOBS.
- Review CCA eligibility at least once every 12 months. See [Reviewing Eligibility](#) for more information.

Medical Absence or Incapacity

Legal reference: 441 IAC 170.2(2)“b”

Policy: PROMISE JOBS can provide CCA to participants attending substance abuse, mental health, and other rehabilitative treatment when the treatment is included in the FIA.

Families may continue to be eligible for CCA for a limited period when a parent who is normally employed or pursuing education is unable to do so because the parent is:

- Absent due to inpatient hospitalization,
- Absent due to outpatient treatment for a physical or mental illness, or
- Present in the home but unable to care for the child due to medical incapacity.

Procedure: When a PROMISE JOBS participant who is normally employed or in training has a need for child care due to a medical absence or incapacity that is not an approvable FIA activity, refer to the policy and procedure described at 13-G, [Need for Service, Medical Absence or Incapacity](#) to determine if CCA can continue.

If approvable under CCA and the care is not needed for an approvable FIA activity, issue form 470-4558 or 470-4558(S), *Notice of Decision: Child Care* in KinderTrack to approve CCA.

If the child care need is not for an approvable FIA activity or under CCA, issue form 470-4558 or 470-4558(S), *Notice of Decision: Child Care* in KinderTrack to deny the request for CCA.

Eligible Child for CCA

Legal reference: 441 IAC 93.11(2); 170.2(2)

Policy: Children are eligible for Child Care Assistance (CCA) benefits up to age 13.

EXCEPTIONS:

- Children with special needs are eligible for CCA benefits up to the age of 19 years.
- Children aged 13 up to age 16, where there are special family circumstances that put the safety and well-being of the child at risk if left home alone, may be eligible for CCA. There must be exceptional circumstances that put the child at risk.

The parent or guardian must request an exception to policy through the normal channels. See 1-B, [Exceptions to Policy](#). The PROMISE JOBS worker should submit documentation of the special circumstances as necessary. The application or review for CCA should be pended until a decision has been made by the HHS Director on the exception to policy.

Procedure: You may approve CCA when the child meets age requirements and:

- The child is in the FIP eligible group of the PROMISE JOBS participant.
- The child would be in the FIP eligible group except for the receipt of Supplemental Security Income (SSI).
- The child whose needs are met by IV-E foster care is living in home of the PROMISE JOBS participant.

Contact the IM worker if questions arise concerning members of the FIP eligible group or children whose needs are not met by FIP, SSI, or IV-E foster care.

Refer to 13-G, [Determining Eligibility, Age](#) for more information.

Refer to 13-G, [Financial Eligibility: Documenting Special Needs](#) for the definition of a “child with special needs” and documentation requirements. If the parent or relative believes that child care is needed as a child aged 13 and up to age 16 will be at risk if left at home, inform the parent or relative that they may request an exception to policy by doing the following:

- Complete form 470-3888, *Petition for Exception to Policy*. See [1-B, Appendix](#) or
- File an electronic request via the HHS website.

Inform the parent or relative that an exception to policy will be granted only if exceptional circumstances exist. Assist the parent or relative with requesting an exception to policy upon request, including forwarding the request and documentation of the special circumstances to the HHS Administrative Rules and Appeals Section.

Two-Parent Households

Legal reference: 441 IAC 93.11(2); 170.2(2)

Policy: When there are two parents in the home, both must have an approvable need for service and there must be an overlap in their hours plus allowable travel or sleep time.

Procedure: In two-parent households, authorize payment for child care only when:

- The family can document that the other parent is unable to provide care, or
- The other parent is employed, in school, or participating in an employment and training program during the hours that care is needed.

Refer to [13-G, Need for Service](#) for more information.

Effective Date of CCA Assistance

Legal reference: 441 IAC 93.11(2), 170.3(3)

Policy: The effective date of assistance for a CCA application shall be the date of application or the date the need for service began, whichever is later.

Procedure: Families receiving FIP, including PROMISE JOBS participants, do not need to complete an application form to request CCA. A request for CCA is considered an “application”.

When determining CCA eligibility for a family that is receiving FIP and an application form is not required, PROMISE JOBS determines the CCA effective date as follows:

- When CCA is needed to participate in an FIA activity that is not otherwise approvable under CCA, the effective date of CCA is the date the person signs the FIA or the date there is a need for CCA to participate in an approved PROMISE JOBS activity, whichever is later.
- When CCA need exists prior to the date the FIA is signed, even if not for an FIA activity, the effective date of CCA is the latter of:
 - The effective date of FIP assistance,
 - 30 days prior to the date of application (request) for CCA, or
 - The date the need for service began.

When approving an application for a family whose eligibility has been denied for not returning requested information, but who subsequently provides the information as well as verification of all changes in circumstances within 14 days of the denial, the effective date of assistance is the date the **final** piece of information required to establish eligibility is provided.

Establishing the CCA Certification Period

Legal reference: 441 IAC 170.3(1)“d”

Policy: Certification periods shall be established for a 12-month period except for the following situations:

- A family includes a child who will turn 13 years old within 6 months from the end of a 12-month certification period.
- A family needs CCA to attend post-secondary education and they will exhaust their 24-month funding limit within 6 months from the end of a 12-month certification period.
- A family’s FIA end date is less than 12 months away.

Procedure: The certification period for a family shall be established for a 12-month period. Do not establish a shorter or longer certification period except when one or more of the situations described in this section applies to the family. In that case, base the length of the certification on the household’s circumstances.

Regularly monitor CCA eligibility. If the family becomes ineligible for CCA during the 12-month certification period, cancel CCA with timely notice, if applicable. See [Written Notice to Participant](#) for more information on issuing a notice of decision and an explanation of when timely and adequate notice is required.

The temporary lapse in need policy described at 13-G, [Temporary Lapse in Need](#) does not apply to persons receiving CCA due to a PROMISE JOBS need.

Situation	Certification Length
Child will turn 13	If the only eligible child will turn 13 within 6 months after the end of a 12-month certification period, establish a longer certification period for the family (up to a maximum of 18 months).
24-month postsecondary funding limit will be reached	If the 24-month funding limit will be reached within 6 months after the end of a 12-month certification period, establish a longer certification period for this family (up to a maximum of 18 months).
FIA end date is less than 12 months away	If the FIA end date is less than 12 months away, establish a shorter certification period that corresponds with the FIA end date for the family.

See [13-G, Establishing the Certification Period](#) for more information and examples.

Approvable Child Care Providers

Legal reference: 441 IAC 93.11(2); 170.4(3)

Policy: A parent can choose care from:

- A licensed child care center.
- A registered child development home.
- A nonregistered child care home.
- A provider who provides care in the child's own home.

A provider located in another state. Only providers who have been approved by HHS and have entered into a *Child Care Assistance Provider Agreement*, form 470-3871 with HHS and meet other specific requirements can receive CCA. HHS determines if a child care provider is eligible for CCA payment.

Procedure: Check KinderTrack to determine if a family's chosen provider is approved by HHS. Follow the procedures described at [13-G, Provider Requirements](#) if a family's chosen provider is not approved by HHS.

Help the participant find an approvable provider, using child care resource and referral agencies as appropriate.

Notice of Decision: Child Care

Legal reference: 441 IAC 170.3(3)

Policy: Each participant has the right to be given information regarding eligibility and benefit determination. The *Notice of Decision: Child Care*, form 470-4558 must be used to notify a participant of actions that affect the participant's CCA eligibility or benefit level.

A *Notice of Decision: Child Care* must be issued at least 10-days prior to the effective date of a CCA cancellation or a decrease in the number of units, except when timely notice is not required due to death or probable fraud. See [Written Notice to Participant, Timely Notice](#) for more information.

The CCA provider will be sent a Certificate of Enrollment, form 470-4444, when the family notice is created to notify them that CCA eligibility has been approved, canceled or changed, and the number of units authorized.

Procedure: Use KinderTrack to issue form 470-4558, *Notice of Decision: Child Care*, to notify the participant of your decision when:

- You approve a request for CCA.
- You deny a request for CCA.
- The number of units authorized for CCA increases or decreases.
- There is a change in providers.
- CCA is canceled.
- PROMISE JOBS services are canceled because FIP is canceled and there is no longer a need for CCA.

When issuing a *Notice of Decision: Child Care* to cancel CCA or to reduce the number of authorized units, the effective date of the notice must be at least 10-days from the issuance of notice, except when timely notice is not required due to death or probable fraud. See [Written Notice to Participant, Timely Notice](#) for more information.

When a family is using multiple providers, pay close attention to the hours that care is needed and the total units of service approved on each *Notice of Decision: Child Care*.

Send one copy of the *Notice of Decision: Child Care* to the participant and file a copy in the case record. If the *Notice of Decision: Child Care* affects a child care provider, also mail a copy of the notice to the provider.

No change is needed to the *Notice of Decision: Child Care* for minor fluctuations in work or training schedules. Make entries to case narratives to explain these fluctuations.

However, if there are large or long term changes to a person's schedule, such as adding or dropping a class, or working overtime on a regular basis, issue a new *Notice of Decision: Child Care*.

These changes need to be reported within 10 days of the change to have the extra child care covered by CCA. If the changes are not reported timely, the units used beyond those authorized will be the responsibility of the parent. Refer to [13-G, Acceptance or Denial of Application and Reporting Changes](#) for more information.

See [13-G, Authorizing Services, Notice of Decision: Child Care](#) for more information.

Unit of Service

Legal reference: 441 IAC 93.11(2); 170.4(2)

Policy: The **unit** of child care service is a **half day**. A half-day unit is defined as up to and including five hours of service. The number of units of service approved each day is based on the hours the parent participates in an FIA activity, including travel time.

"Actual travel time" includes the time spent between the child care facility and the place of employment or training. For in-home care, actual travel time includes the time spent between home and the place of employment or training.

Procedure: Gather information from the parent and the employer, educational institution, or other service provider to determine the time needed for the parent to work, attend training, or look for work, or for sleep time during daytime hours. Use the verified training or employment schedule of the parent and the actual travel time to determine the number of half-day units needed per day.

Refer to [13-G, Unit of Service](#) for more information on determining the number of half-day units needed, including examples.

Rate of Payment

Legal reference: 441 IAC 93.11(2), 170.4(7)

Policy: CCA payment rates are based on a half-day unit of service. The child care rate tables for basic and special needs care represent statewide maximum rate ceilings derived from a market rate survey of child care providers.

Procedure: HHS establishes the provider's rates of payment. Refer to [13-G, Establishing Payment Rate](#) to view the tables for basic and special needs care and for more information regarding rates.

Select the applicable provider rate according to the situation when approving CCA in KinderTrack.

Client Fees

Policy: A fee is assessed for each half—day unit of service for CCA. A fee is **not** assessed to:

- Recipients of FIP and PROMISE JOBS services.
- Families at or below 100% of the federal poverty guidelines.
- Families receiving CCA due to a protective need.

Procedure: Do not assess fees for PROMISE JOBS participants.

Refer to [13-G, Fee Schedule](#) for more information.

In-Home Care

Legal reference: 441 IAC 93.11(2), 170.4(7)“d”

Policy: “In-home care” refers only to care provided in the home of the child.

A participant may only use an in-home provider when the family has three or more children who require and are eligible for child care services.

EXCEPTION: If the provider lives in the same household as the children requiring care, HHS will treat the provider as either a registered child development home or a nonregistered home as long as the home is a single-family residence that the provider owns, rents, or leases.

In-home care is paid at the minimum wage amount. Minimum wage x 5 hours = a half day rate or unit of service.

The in-home half-day rate is not a per-child amount. It is the maximum amount paid for all of the children in a family receiving in-home care.

Procedure: Approve in-home care only when the family has three or more children who require and are eligible for child care services.

All of the children in the family requiring child care must receive their care from the in-home provider. However, the children need not all receive the same number of units of service in a 24-hour period. For example, the care may include both before- and after-school care to the school age children in the family and full-day care to the preschool children in the family.

If the provider lives in the home of the children needing care and the provider does not own, rent or lease the location, and the family does not have at least three children needing care, inform the family that they will need to select a different provider.

Refer to [13-G, Eligible Providers and Provider Requirements](#) for more information.

Other Payment Policies

Legal reference: 441 IAC 93.11(2), 170.4(7)

Policy: Do not approve a separate payment for transportation. Any charge for transportation included as part of the child care service is payable only when it is included as part of the provider's established rate.

Payment may be made to a provider for a child not in attendance at the child care facility not to exceed four days per calendar month, providing that the child is regularly scheduled on those days and the provider also charges a private customer for days of absence.

Do not approve payment to two providers for the same period of time except when the primary provider is closed for a holiday and charges private pay families for the day.

Procedure: Refer to Limits on Payment for more information and [13-G, Days of Absence](#) for more information.

Reviewing Eligibility

Legal reference: 441 IAC 170.3(5), 170.3(1)"d," 170.4(2)

Policy: Review CCA eligibility, the number of units the family is eligible for, and the parent's fee at least every 12 months.

Procedure: Verify eligibility criteria, such as need for service, hours worked, work schedule, student status and school schedule at least once every 12 months.

Grace Period Following the Denial of a CCA Application

Legal reference: 441 IAC 93.11(2), 170.3(6)

Policy: Families receiving FIP and participants in PROMISE JOBS approved activities do not need to complete an application to request CCA.

The date of application for families receiving FIP, including families with PROMISE JOBS participants, is the date the family requests CCA.

When a CCA application is denied for failure to provide requested information, eligibility for CCA can be reconsidered without a new application, if all necessary information to establish eligibility, including verification of any changes, is provided within 14 days of the date on the Notice of Decision denying the application. If eligibility is established, the effective date of CCA is the date all of the information is provided.

Procedure: When PROMISE JOBS denies a CCA application for failure to provide requested information, PROMISE JOBS will need to reconsider CCA eligibility if all necessary information to establish eligibility is provided within 14 days of the date on the notice denying the application. If PROMISE JOBS determines eligibility, PROMISE JOBS will approve CCA as of the date that all of the information is provided.

Refer to [13-G, Grace Period Following the Denial of an Application](#) for more information.

Reinstatement After the Effective Date of CCA Cancellation (Grace Period)

Legal reference: 441 IAC 170.3(6)

CCA Policy: When a CCA case is cancelled for failure to provide requested information, CCA must be reinstated when all information needed to determine eligibility, including verification of all changes in the family's circumstances, is provided within fourteen days of the effective date of cancellation.

The effective date of child care eligibility shall be the date the **final** piece of information required to establish eligibility is provided or the first day of need, whichever is later.

Procedure: If PROMISE JOBS cancels a CCA case for failure to provide requested information, PROMISE JOBS will reinstate CCA if the participant provides all information needed to determine eligibility, including verification of all changes in the family's circumstances, within fourteen days of the effective date of cancellation.

Refer to [13-G, Reinstatement After the Effective Date of Cancellation \(Grace Period\)](#) for more information.

Education Expenses

Legal reference: 441 IAC 93.11(239B)

Policy: Participants enrolled in high school completion or equivalency classes, ABE, ESL and in an approved postsecondary education training plan may be eligible for payment to cover the cost of training expenses.

Participants are expected to use PROMISE JOBS payments that they received to pay authorized training expenses.

Retroactive payments for transportation and allowable for transportation and allowable direct education costs shall be allowed only under the following conditions:

If training plan approval or removal from a waiting list occurs after the start of the term due to administrative delay or worker delay, payments needs to be approved retroactive to the start of the term for which the plan is approved or removal from the waiting list is authorized. If the participant has already paid costs with private resources, the participant shall be reimbursed if the participant provides a receipt verifying that they paid the cost.

If plan approval is delayed due to the fault of the participant, payment eligibility begins with the first day of the month during which the training plan is approved or the month in which the participant is removed from a waiting list, whichever is later. In this instance, the participant cannot be reimbursed for costs already paid by the participant.

Procedure: Do not issue a payment for:

- Any item that is being paid for through earnings that are diverted for that purpose.
- Purchase of supplies to enable a participant to begin a private business.

To request payment for the cost of an educational expense or to change the amount of payment, require participants to submit form 470-0510, *Estimate of Cost*, for expenses other than child care.

Use PJCase to issue expense payments.

EXCEPTION: Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having an SSN. Document each authorization in the case file narrative.

For more information on approvable expense payments for those who are enrolled in any approvable PROMISE JOBS postsecondary training plan, high school completion or equivalency classes, ABE, or ESL, see:

- Supportive Payments for Basic Education, and
- Supportive Payments for [Postsecondary Education](#), and [Direct Education Costs for Short-Term Postsecondary Training](#)

The following sections explain:

- [Direct education cost](#)
- [Payments to training providers](#)
- [Tuition](#)
- [Fees, books, and supplies](#)
- [Certification and testing costs](#)
- [Practicum living costs](#)
- [Timing of payments](#)
- [Participant responsibilities](#)

Direct Education Costs

Legal reference: 441 IAC 93.11(4)

Policy: Participants with an approved short-term postsecondary training plan may be eligible for payment to cover the cost of direct education costs when needed to participate in the training plan. “Short-term” training is a program that takes less than 30 weeks to complete.

Procedure: Use PJCase to issue payment for the following PROMISE JOBS direct education costs only for participants in a postsecondary short-term training program of less than 30 weeks, or in high school completion or equivalency classes, ABE, or ESL:

- Tuition.
- Fees, including graduation.
- Books.
- Basic school supplies.
- Specific supplies, including tools, and required uniforms, related to obtaining credit for a course and required of all students in a course.

EXCEPTION: Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having an SSN.

Do not authorize payment for direct education costs for any participants in postsecondary training, except those in short-term training of less than 30 weeks. All other participants in postsecondary training must be able to demonstrate ability to cover direct education costs from other funding sources, such as financial aid.

Payments to Training Providers

Legal reference: 441 IAC 93.11(4)

Policy: Payments for the educational expenses of tuition, fees, and books and supplies need to be made directly to the training provider except when circumstances indicate the payment should be issued to the participant. It is appropriate to issue payment to the participant when the participant provides a receipt showing that the participant paid the expense with their own personal funds.

Procedure: Use PJCase to issue payment for expenses allowable under these policies directly to the training provider for the educational expenses of tuition, fees, books, and supplies that are provided by the facility and billed to the PROMISE JOBS participant.

EXCEPTION: Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having an SSN.

Make payment directly to the training provider, unless circumstances indicate that payment should be issued to the participant. These include reimbursement for the participant who documents payment with personal funds and other circumstances as approved by the central office of the PROMISE JOBS provider agency.

For example, the participant is entitled to reimbursement when the provider required payment before the provision of services or required payment within time limits that forced the participant to pay for education expenses out of the participant's own resources or income.

Charges for tuition and fees, books, and supplies that are provided by the facility and billed to the participant shall be submitted on form 470-0510, *Estimate of Cost*, signed by an official of the training facility.

If a standardized list of tuition, fees, and supplies is attached to the *Estimate of Cost* in lieu of completing the form, an official of the training facility should sign both the standardized list and the *Estimate of Cost*.

Tuition

Legal reference: 441 IAC 93.11(4)

Policy: The PROMISE JOBS payment for all eligible programs (high school completion and equivalency classes, ABE, ESL, or short-term training of less than 30 weeks), shall not exceed the rate charged by the Iowa community college closest to the participant's residence that offers a program comparable to the one in which the participant plans to enroll.

If a community college in Iowa does not offer a comparable program, the maximum tuition rate payment shall not exceed the Iowa resident rate charged by an out-of-state community college closest to the participant's home.

Procedure: Do not approve payment for tuition that exceeds the rate:

- Charged by the Iowa community college closest the participant's residence and offering a comparable program.
- Charged to an Iowa resident by an out-of-state community college closest to the participant's home.

Fees, Books, and Supplies

Legal reference: 441 IAC 93.11(4)

Policy: For participants in high school completion or equivalency classes, ABE, ESL, and short-term training of less than 30 weeks, these three policies apply:

- The participant should not be required to use the FIP grant to pay for items needed to allow that person to participate in the education programs above.
- The requested item must be an item required for the course and must be specifically related to obtaining credit for the course.
- Participants who request payment for supplies are eligible for a standard payment of \$10 or payment for actual costs if higher and verified.

Procedure: Use PJCase to issue standard payment of \$10 per term or actual cost, whichever is higher, for basic school supplies for those participants who request it.

EXCEPTION: Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having an SSN. Remember that the \$10 standard allowance is not an automatic issuance, but must be requested by the participant.

Payment can be authorized for actual costs of basic school supplies greater than the \$10 standard allowance per term when these costs are for supplies such as notebooks, pens, pencils, and paper, since these items are required of all students. Any claim for actual costs **higher** than \$10 must be verified by receipts.

PROMISE JOBS funding is limited. Participants are expected to shop conservatively. Expenditures must be minimized to allow service to the largest number of participants possible. Do not allow optional items, such as book bags that are not required or necessary for course completion.

Unusual items, such as tutors and paper typing fees, are not required of all students in the curriculum and cannot be paid for by PROMISE JOBS money. The fact that the participant's work will look nicer if it is typed is immaterial.

Some valid needs are not required of all students in the curriculum.

When a participant requests payment for an unusual item, first, look and see what is available through the school at no cost. Second, check into the costs of rental. Do not buy an item if the need for it is short-term. Consider also whether the costs of rental exceed the cost of the needed item.

When a lower cost alternative is not available, forward the situation to the IWD central office for discussion with HHS central office, before authorizing any expenditure.

If permission is granted to buy an unusual item of equipment, make it clear to the participant that this item has been purchased for the program, and not for the participant.

Once the participant has completed the course or courses for which the item is needed, the item must be returned to the PROMISE JOBS office. It will then be available for the next participant with a similar need.

Certification and Testing Costs

Legal reference: 441 IAC 93.11(4)

Policy: Participants in high school completion or equivalency classes, ABE, ESL, and short-term training of less than 30 weeks may be eligible for:

- A transportation payment for any costs of travel required for certification and testing.
- A payment for required meals and lodging.

Procedure: Use PJCase to issue payment when participants travel or stay away from home due to certification requirements or other testing needed for vocational purposes.

EXCEPTION: Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having an SSN. Authorize the payment up to the following limits:

- Authorize transportation allowances as described at [Transportation](#).
- Allow the current state employee reimbursement rate for meals and lodging.

Practicum Living Costs

Legal reference: 441 IAC 93.11(4)“a”(3)

Policy: A per diem payment of \$10 per day for living costs during a practicum must be allowed when the practicum meets the following criteria:

- It is required by the curriculum of the training facility.
- It will require a round trip commuting time of three hours or more per day.
- It is not available closer to the participant’s home.

If practicum earnings or any non-reimbursable assistance is available to meet practicum living costs, no allowance shall be made.

Procedure: Use PJCase to issue the payment of \$10 for living costs during a practicum.

EXCEPTION: Contact IWD QA for instructions on how to proceed with participants who are not in PJCase due to not having an SSN.

Timing of Payments

Legal reference: 441 IAC 93.8(6), 93.11(4)

Policy: PROMISE JOBS responsibility for financial assistance begins with the later of:

- The month when the participant begins training under an approved plan; or
- The month when the participant is removed from a waiting list.

Participant eligibility for payment of transportation and CCA shall commence for the month when the participant begins training under an approved plan or is removed from a waiting list, whichever is later. Eligibility shall terminate when training is terminated.

Procedure: Allow retroactive payments only under the following conditions:

- If the plan approval or removal from a waiting list occurs after the start of the term due to administrative error or worker delay, approve payments retroactive to the start of the delay for which the plan is approved.

If the participant already paid the costs with private resources, reimburse the participant. Approve payments for tuition, fees, books, supplies, and transportation. Retroactive payments for child care can be paid only to a provider.

- If plan approval is delayed due to the fault of the participant, payment eligibility begins with the first day of the month that the plan is approved or the month that the participant is removed from a waiting list, whichever is later. Do not reimburse training costs already paid for by the participant.

Do not make reimbursement if costs were paid with educational awards that are not subject to repayment.

Do not authorize transportation payments under PROMISE JOBS when a participant:

- Receives transportation payments from another program or agency that equal or exceed those paid by this program, or
- Receives transportation assistance in kind that meets transportation needs.

When the amount received from another program is less than that paid by PROMISE JOBS, a supplemental payment may be made, as long as the combined payment does not exceed that normally paid by PROMISE JOBS. Do not authorize payments that exceed the rate that the provider would charge a private individual.

When a participant is already involved in training before attending orientation with PROMISE JOBS, eligibility for transportation and child care allowances begins for the month when the training plan is approved or the participant is removed from the waiting list, whichever is later.

Participant Responsibilities

Legal reference: 441 IAC 93.8(6), 93.11(4)

Policy: Participants must submit form 470-0510, *Estimate of Cost*, to initiate expense payments or change the amount of payment for all types of expenses except for child care. Participants shall use PROMISE JOBS expense payments that they receive to pay authorized expenses.

Participants must furnish receipts for expenditures. **EXCEPTION:** Receipts are not required for transportation allowances and items purchased with the \$10 standard payment for basic school supplies.

Failure to provide receipts will preclude payment of additional payments. Receipts may be requested for payments paid directly to a provider if the PROMISE JOBS worker determines it is appropriate.

Participants are required to provide receipts for tuition, fees, and books and supplies furnished by the training provider only when the payment was issued to the participant instead of to the training provider.

If circumstances seem to indicate that verification or clarification of payment is needed, ask for receipts for payments paid directly to a training provider.

Procedure for Lost, Stolen, or Missing EAC or PROMISE JOBS Warrants

Procedure: Most PROMISE JOBS supportive payments are issued on the participant's FIP electronic access card (EAC) card, also known as a debit card except when:

- The payee requests direct deposit to the payee's account at a financial institution.
- The payee does not have a social security number.
- The payee is not the case name (head of household) for the case.

Refer participants with questions or problems using their FIP EAC, or who report their card is lost or stolen to the Conduent Customer Service Center at 1-844-207-3225. This number is available toll free, 24 hours per day. Also refer participants to the Conduent website at www.GoProgram.com for additional information on the FIP EAC.

Contact your IWD QA person for instructions on how to proceed:

- If a participant or provider reports a lost or stolen PROMISE JOBS warrant or,
- A participant whose FIP and PROMISE JOBS payments are directly deposited to their account and who reports not receiving their payment.

Recovery of PROMISE JOBS Supportive Payment Overpayments

Legal reference: 441 IAC 93.12(239B)

Policy: All PROMISE JOBS supportive payments are subject to recovery if the participant or provider is not eligible for the payment. (For policy and procedural instructions regarding claims for Child Care Assistance, see [13-G, Overpayment Recovery](#).)

Procedure: When you discover an overpayment, report it to the Department of Inspections, Appeals, and Licensing (DIAL), even if the overpayment occurred while the case was in another PROMISE JOBS office or the case is about to be transferred to another PROMISE JOBS office.

When you transfer a case to another PROMISE JOBS office, the receiving worker shall continue to take appropriate action with regard to repayments. When an appeal request is filed between the time the case is transferred and the end of the 30-day appeal period, the receiving worker shall complete the updated report to DIAL.

Notification of PROMISE JOBS Overpayment

Legal reference: 441 IAC 93.12(239B)

Policy: PROMISE JOBS needs to notify DIAL of the name of the debtor, the amount of the overpayment, and the type of error that caused the overpayment.

Procedure: Notify the Iowa Department of Inspections, Appeals, and Licensing (DIAL) of the name of the debtor, the amount and the type of error that caused the overpayment through entry in WOPR . This records the overpayment claim with DIAL.

Follow the WOPR user guide for entry instructions.

Complete only one WOPR entry for each overpayment period for any category of overpayment. An overpayment period consists of consecutive months of overpayment. Use the total amount for that period rather than completing an entry for each month of the overpayment period.

EXAMPLE:

The PROMISE JOBS worker discovers on May 26 that a participant was ineligible for FIP for the months of April, May, and June. Monthly transportation payments of \$34 were issued for all three months. CCA payments were issued for \$108 for April and \$96 for May. A payment for \$10 for basic school supplies was issued for May.

The worker completes one WOPR entry with claim dates for transportation from April 1 to June 30, with total owed of \$102. The worker makes another WOPR entry for basic supplies of \$10 with claim dates from May 1 to May 31. The worker makes a final WOPR entry for the CCA overpayment. The date established for each claim is May 26.

When the months in which overpayments in a category were received are not consecutive, two overpayment periods exist and two separate claim information sections need to be entered in WOPR.

Because some PROMISE JOBS expense payments are paid to training providers, it is important to establish the correct debtor when entering the claim in WOPR.

- The provider is the debtor when the provider caused the overpayment, e.g., by providing false or otherwise incorrect information about hours, rates, fees, etc., intentionally or otherwise, or when the provider, for whatever reason, received payment for services not rendered.
- The participant is the debtor in all other instances. This includes when the provider rendered services in good faith but received an overpayment because the participant:
 - Was ineligible for part or all of the payment due to agency error, or
 - Provided false or incorrect information, intentionally or otherwise.

Because the amount to be withheld from the FIP grant is determined by the claim reason entered in WOPR, it is extremely important to enter the correct code in the “Claim reason” field of WOPR. Use the following definitions in choosing the correct code:

Participant errors that apply to PROMISE JOBS are:

- False or misleading statements (either oral or written) about the participant’s income, resources, or other circumstances that affect eligibility or the amount of assistance received.
- Failure to timely report changes in income, resources, or other circumstances that affect eligibility or the amount of assistance.
- Failure to timely report the receipt of a duplicate warrant.

Agency errors that apply to PROMISE JOBS are:

- Misfiling or loss of forms or documents.
- Errors in typing or copying.
- Computer input errors.
- Mathematical errors.
- Failure to certify allowances correctly when essential information was available.
- Any error that is not a participant error.

DIAL notifies participant of overpayments after a claim has been established in WOPR. DIAL sends form 470-4688, *Notice of PROMISE JOBS Overpayment* to the participant or the provider. The letter lists the dates of the overpayment, the cause of the overpayment and the total amount of the overpayment.

Complete form 470-0465, *Overpayment Recovery Supplemental Information*, when:

- The total expense payment overpayments exceed \$1,000.
- The PROMISE JOBS expense payment overpayment combined with a FIP program claim for the same time period exceeds \$1,000.
- DIAL requests the information to pursue recovery action.

Send the completed *Overpayment Recovery Supplemental Information* to DIAL. See the [PJPM Appendix](#) for instructions.

The participant or provider has 30 days to appeal the notice. If the participant or provider appeals within the 30-day appeal period, the HHS Administrative Rules and Appeals Unit notifies DIAL so recovery actions are suspended until the appeal process is complete in WOPR.

If a participant or provider wishes to make repayment, in part or in full, before the end of the appeal period, accept the payment, following the procedures under [Collection of Overpayments](#).

Collection of Overpayments

Legal reference: 441 IAC 93.12(239B)

Policy: PROMISE JOBS may accept a payment from a participant or provider to repay an overpayment.

Procedure: While PROMISE JOBS may accept payment, PROMISE JOBS should encourage the participant or provider to send payments directly to:

HHS Bureau of Payments and Receipts
HHS Cashier, 6th floor
321 E. 12th St
Des Moines, IA 50319

When a participant or provider seeks to repay a PROMISE JOBS overpayment directly to PROMISE JOBS, accept the payment and issue a receipt, form 470-0009, *Official Receipt*. Ask the participant or provider to make checks or money orders payable to the "Iowa Department of Health and Human Services." If a participant makes a cash payment, convert the cash to check or money order and make it payable to the "Iowa Department of Health and Human Services". Issue form 470-0009, *Official Receipt*. Transmit repayments received to the HHS Cashier's Office.

Complete form 470-0010, *Adjustment to Overpayment Balance*, following the instructions in the [PJPM Appendix](#). Mail the completed form with a copy of the receipt and the funds to:

HHS Bureau of Payments and Receipts
HHS Cashier, 6th floor
321 E. 12th St
Des Moines, IA 50319

EXCEPTION: When a participant or provider returns a state warrant for the current month because the warrant represents an overpayment, accept the warrant and issue a receipt. Do not record an overpayment in WOPR because no overpayment has actually occurred.

Send the warrant along with the appropriate copy of the receipt to the HHS Cashier's Office at the address given above.

DIAL Recovery Procedures

Legal reference: 441 IAC 93.12(239B)

Policy: DIAL recovery actions include FIP grant reduction, agreements to repay, civil action (small claims court and Attorney General's actions), debt setoff (repayment by setoff of debtor's state income tax refund), income setoff (repayment by garnishment or attachment of a state warrant), and criminal prosecutions.

When a participant or provider has been referred to DIAL to initiate recovery, DIAL will use the same methods of recovery as are used for FIP, except the FIP grant shall not be reduced without the participant's written permission.

When the participant asks DIAL for grant reduction on form 470-0495, *Repayment Contract*, the reduction will be made according to FIP overpayment recovery policies. A brief explanation of the FIP grant reduction procedure is included for reference.

Recovery is based on a percentage of the basic needs (the amount of a full FIP grant that the eligible group would be entitled to) taken from the FIP Schedule of Basic Needs. The amount of the monthly reduction is based on the cause of the overpayment. Recovery from basic needs is made at a rate of:

- 1% of basic needs for overpayments resulting solely from an agency error.
- 10% of basic needs for overpayments resulting from participant error or a combination of participant and agency error.

- 10% of basic needs for overpayments resulting from continuation of benefits pending a decision on an appeal or a combination of continued benefits and agency or participant errors.

Participants who choose FIP grant reduction cannot choose the amount of the reduction. The applicable percentage applies regardless of any circumstances that might cause the group to receive a partial FIP grant, such as receipt of other income.

EXAMPLE:

If the Schedule of Basic Needs for a FIP eligible group was \$426, the amount withheld from the FIP grant is \$42.60 or \$4.26, depending upon the cause of the overpayment. This is true even if the eligible group is determined, for example, to be eligible for only \$401 a month because of \$25 countable income.

However, through the agreement to repay, the participant may volunteer to make monthly payments in an amount greater than the standard amount by which the FIP grant would be reduced. When recovery is made by withholding from the FIP grant, the payment issued cannot be less than \$10.

If there is already an FIP overpayment claim, FIP grant reduction will be used to recover the FIP overpayment and will not be available for recovery of PROMISE JOBS overpayments.

With regard to provider overpayments, DIAL is authorized to take any reasonable action to effect recovery, such as but not limited to, informal agreements, civil action, or criminal prosecution. However, DIAL shall not take any action that would jeopardize the participant's continued participation in PROMISE JOBS.

A provider may threaten to withhold services from a PROMISE JOBS participant if DIAL initiates recovery procedures. If this threat jeopardizes the participant's progress toward the employment goal (for example, if no other provider is available) do not notify DIAL to initiate recovery until the participant no longer needs those services.

Procedure: If a PROMISE JOBS participant requests FIP grant reduction from you, explain that this can be arranged only through DIAL.

Case Management

This section contains policies on:

- [Electronic Searches of Applicants and Participants](#)
- [Required verification and documentation](#)
- [Written notification to participants](#)
- [Records Maintenance](#)
- [Reporting requirements](#)

Electronic Searches of Applicants and Participants

Legal Reference: 441 IAC 9, 93.10, 93.4(5), 42 USC 602(a)(1) and Title VII of the Civil Rights Act

Policy: When gathering information, gather and keep only the information that is necessary. See [1-C, Gathering Information](#) for more information.

PROMISE JOBS staff may conduct electronic searches of applicants and participants if there is a necessary and compelling reason. All electronic searches require the applicant or participant's knowledge and informed consent.

Procedure: Prior to conducting an electronic search of an applicant or participant, there must be both a compelling or necessary reason **and** informed consent from the customer.

To avoid harming an applicant or participant and to preserve the professional relationship, exercise judgment when determining whether there is a compelling or necessary reason.

Compelling or necessary reasons to conduct an electronic search include but are not limited to:

- Assisting a participant secure employment,
- Helping with job readiness by showing a participant their digital footprint,
- Showing a participant timelines and outcomes of court records, or
- Checking a participant's criminal background to ensure they are not excluded from a certain profession in the instance that the participant is not sure.

Obtain informed consent prior to conducting any electronic search of the applicant or participant by explaining the reason for the search and how the information may help in achieving the applicant or participant's goals. Discuss the outcome or information obtained from the electronic search with the applicant or participant.

Document the compelling or necessary reason for the electronic search, the applicant or participant's informed consent, and the outcome of the electronic search and conversation in the PROMISE JOBS case file.

Do not preemptively conduct searches of applicants or participants on publicly available search engines, including but not limited to:

- Social media sites,
- Iowa Courts Online
- National or state sex offender registries,
- Google, Bing, etc.

NOTE: Online searches such as Google results or social media sites are not considered verified sources and cannot be used as the only evidence to act on a case, even when the search is conducted appropriately.

During the creation of her FIA, Ms. A reports to her PROMISE JOBS advisor that she is interested in pursuing a career in nursing and has a past theft conviction in Iowa. Ms. A states she cannot recall the year or the exact charge. The PROMISE JOBS advisor explains to Ms. A that a search of Iowa Courts Online or the Iowa Department of Corrections website may be conducted with her permission to find out the year and the adjudication of the charge, as certain theft convictions might interfere with a career in nursing. Ms. A agrees to a search of Iowa Courts Online for this purpose and the search is conducted with Ms. A present. The advisor shares with Ms. A what information was present on that site about the theft conviction. The PROMISE JOBS advisor does not check the Iowa Department of Corrections website as Ms. A did not agree to this. The advisor documents the conversation and the outcome of the search in the case file.

While meeting with his PROMISE JOBS advisor, Mr. B states that he has a few misdemeanors in his past but does not believe these would be a problem for the jobs he is applying for. The PROMISE JOBS advisor asks what the convictions were for, and Mr. B states that he does not feel comfortable disclosing that since he doesn't think it would affect his employment prospects. The PROMISE JOBS advisor explains that certain convictions, even misdemeanors, might delay him from getting a job, which is why they asked. Mr. B tells the worker that he understands but doesn't want to discuss it. The PROMISE JOBS advisor documents the conversation and does not look online for what Mr. B's past charges might be.

Mr. C called in sick all last week to FIA activities but came in today to see his PROMISE JOBS advisor. Mr. C has no job history and shared that he is concerned about what information might be out there about him online. His PROMISE JOBS advisor obtains consent from Mr. C to conduct a Google search of his name so they can see what potential employers might see if they look him up. In this process, they see Mr. C's public Facebook page, which has photos of him at the beach last week. The PROMISE JOBS advisor shows Mr. C the results of the Google search and they go over what employers might think about the various results and how to prevent your social media from harming your employment options. The PROMISE JOBS advisor also asks Mr. C for documentation of his illness from last week but does not act on the Facebook photos alone as failure to participate in FIA activities.

Required Verification and Documentation

Legal reference: 441 IAC 93.10(239B)

Policy: PROMISE JOBS participants are required to provide any documentation necessary to verify that the participant is carrying out the terms of the FIA. Specific policies are explained on:

- [Verifying problems or barriers](#)
- [FIA activities provided by PROMISE JOBS](#)
- [FIA activities provided by other providers](#)
- [Job search documentation](#)
- [Verifying and projecting employment hours](#)

Verifying Problems or Barriers to Participation

Legal reference: 441 IAC 93.10(3)

Policy: PROMISE JOBS may require a participant to provide written verification or supporting documentation when the participant fails to participate in FIA activities due to:

- Temporary problems with participation, such as illness or family emergency.
- Barriers to participation as described at Barriers to Participation, such as but not limited to lack of transportation.

Written verification or supporting documentation is not required.

When documentation or supporting documentation is needed, PROMISE JOBS needs to request the verification or supporting documentation in writing and allow the participant at least 10 calendar days to provide the documentation or supporting documentation.

A failure to participate is not excused when a participant fails to provide verification or supporting documentation when requested in writing and may result in imposition of an LBP if not provided after PROMISE JOBS sends a written reminder.

Participants who reveal substance abuse, mental health, or other medical issues or limitations that are affecting the family's ability to participate in FIA activities on a full-time basis must provide medical verification of the issue to allow the treatment plan to be included in the FIA. Acceptable verification can be provided on form 470-0447, *Report on Incapacity*, or other statement signed by a qualified medical or mental health professional for the treatment to be included in the FIA and considered when determining the participant's level of participation.

PROMISE JOBS may require a person to complete a medical examination before including a particular PROMISE JOBS activity in the FIA when a participant specifies or exhibits any condition that might jeopardize successful participation in an FIA activity.

PROMISE JOBS needs to request the medical verification or need for medical examination in writing and allow the participant at least 10 calendar days to provide the verification.

A participant who claims they are not able to participate in FIA activities on a full-time basis due to a disability or other problem or barrier and who fails to provide verification of the problem or barrier after being notified in writing is expected to participate in FIA activities at a level that is equivalent to full-time employment or significant so as to move toward this level.

Procedure: When you determine written verification or supporting documentation of a participant's failure to participate in FIA activities due to a problem or barrier to participation is needed, request the documentation in writing. Allow the participant at least 10 calendar days to provide the documentation or supporting documentation.

Failure to provide verification or supporting documentation following a failure to participate in an FIA activity when requested in writing and after receiving a written reminder from PROMISE JOBS results in imposition of an LBP.

Participants who reveal substance abuse, mental health, or other medical issues or limitations that are affecting the family's ability to participate in FIA activities on a full-time basis to provide verification of the issue on form 470-0447, *Report on Incapacity*, or other statement signed by a qualified medical or mental health professional for treatment for the issue to be included in the FIA and considered when determining the participant's level of participation.

Notify the participant in writing of the need to provide documentation or verification. Allow the participant 10 calendar days to provide the verification or documentation.

When you determine the need for a medical examination, require the participant to document the results of the examination on form 470-0447, *Report on Incapacity* or a statement completed by a qualified medical or mental health professional. Ask the professional to indicate to the best of their knowledge whether the participant is capable of completing the FIA activity or continuing with employment.

Notify the participant in writing of the need to provide documentation of the results of the examination. Allow the participant 10 calendar days to provide the documentation.

Expect a participant who claims inability to participate in FIA activities on a full-time basis due substance abuse, mental health, or other medical issues or limitations and who does not provide documentation to support their claim to participate in FIA activities on a full-time basis or significant so as to move toward this level.

Expect a participant who fails to obtain a required medical examination or to provide written documentation of the results of an examination to participate in FIA activities at a level that is equivalent to full-time employment or significant so as to move toward this level. Consider any needs or problems that are either verified or you have determined to accept the participant's statements without documentation. Schedule the participant to discuss renegotiation of the FIA, when necessary.

Do not impose an LBP for failure to:

- Provide a completed *Report on Incapacity*, form 470-0447, or other documentation to support a claimed inability to participate in FIA activities on a full-time basis due substance abuse, mental health, or other medical issues or limitations.
- Obtain a medical examination or to provide documentation of the results of the examination or assessment.

Refer to [Problems With Participation](#), [Barriers to Participation](#), and [Mental Health, Substance Abuse, and Other Rehabilitative Treatment](#) for more information.

FIA Activities Provided by PROMISE JOBS

Legal reference: 441 IAC 93.10(2)

Policy: Actual hours of participation and a participant's progress in FIA activities must be monitored, documented and verified.

Procedure: For activities that are provided by and monitored by PROMISE JOBS, PROMISE JOBS must monitor the participant's progress and document the participant's actual hours of participation. This applies to activities, such as job readiness skills training and structured job search.

Report actual hours of participation for each week in the IowaWORKS system as described at [Reporting Participation Hours](#). Document the hours in the participant's case file. Do **not** enter any hours in IowaWORKS that are not supported by documentation in the case file.

FIA Activities Provided by Other Providers

Legal reference: 441 IAC 93.10(2)

Policy: Actual hours of participation and a participant's progress in FIA activities must be monitored, documented and verified.

Procedure: When FIA activities are provided by an agency or provider other than PROMISE JOBS, require the provider to monitor the participant's progress and to document and verify the participant's actual hours of participation. Actual monthly hours must be documented on form 470-2617, *Time and Attendance* except as specified at [Distance Learning](#).

For educational activities, the provider needs to verify actual hours of attendance in classroom and lab activities, and in supervised study activities, on the attendance form. See [Reporting Participation Hours](#) for more information.

EXCEPTION: If the participant is under age 20 and in high school or high school equivalency classes, the participant may verify the hours by completing, signing and dating form 470-2617, *Time and Attendance*.

Require the participant to provide the completed, signed and dated form 470-2617, *Time and Attendance* or other documentation of their hours by the tenth calendar day following the end of the month of participation, unless the provider provides the form to PROMISE JOBS within this time frame.

Notify the participant in writing of the requirement to provide verification of actual hours of participation as described at [Written Notice to Participant](#).

EXAMPLE:

On August 15, 2020 Ms. A signs her FIA to attend college in an AA program beginning August 20, 2020 through May 20, 2022. Ms. A's FIA states that she needs to provide time and attendance reports to PROMISE JOBS monthly by the 10th day of the month following the month of participation and that her first time and attendance report for August is due September 10, 2020.

Ms. A must provide September's report by October 10; October's report by November 10, November's report by December 10 and so on.

Use the completed *Time and Attendance* to monitor the participant's involvement and progress in the activity to determine if the participant is demonstrating effort and is carrying out the steps of the FIA. Document the participant's progress in the case record.

Do not include an activity in an FIA when the activity is provided by a provider other than PROMISE JOBS and the provider is unwilling to verify and document actual hours of participation. See [Training Provider Requirements](#) for more information.

Report actual hours of participation for each week in the IowaWORKS system as described at [Reporting Participation Hours](#). Document the hours in the participant's case file. Do **not** enter any hours in IowaWORKS that are not supported by documentation in the case file.

When the participant fails to provide verification of actual hours of participation in the activity after being notified in writing of the requirement, the participant is considered to be choosing an LBP. Follow the procedures at [FIA Participation Issues](#) to attempt to resolve the issue.

Distance Learning

Legal reference: 441 IAC 93.10(2)

Policy: A participant's actual hours of participation in a distance-learning program must be verified.

Procedure: Determine a method for verifying hours of participation in distance-learning activities through discussion with the participant and if necessary, the training provider.

Documentation may include attendance records or log-in and log-out records available on-line or in an electronic format. If another agency is monitoring the student's actual participation in distance-learning, the agency may provide verification.

Actual hours of participation in distance learning may also be documented on the *Time and Attendance* when possible.

The participant is responsible for providing the documentation within 10 calendar days following the end of the month of participation unless the training provider provides the documentation to PROMISE JOBS within this time frame.

Job Search Documentation

Legal reference: 441 IAC 93.10(2)

Policy: A participant's actual time spent in activities directly related to finding employment must be documented by the participant and verified when reasonable. Actual hours of participation must be reported on form 470-3099, *Job Search Record*.

Only documented actual hours of participation can be reported for federal reporting purposes.

Procedure: For job search activities that do not occur at the IWD site, require participants to document the actual time spent in job search activities directly related to finding employment on form 470-3099, *Job Search Record*. Notify the participant in writing of the requirement on form 470-4481, *Job Search Plan Agreement*.

"Activities directly related to finding employment" includes time spent finding job openings and potential job contacts, making job contacts, attending job interviews, attending job fairs, and the travel time between job contacts or interviews. Travel time to the first job contact or interview and travel time home after the last contact does not count.

Participants with individual job search or structured job search in their FIA may participate in job readiness activities in addition to job search activities. In this situation, the participant should report actual hours of participation in job readiness activities on the *Job Search Record* form.

Ask the participant to provide supporting documentation of a job search activity along with the *Job Search Record* when the activity can be reasonably verified. For example:

- Using a personal computer and printing a history of the times and web-sites searched, or
- Using a computer in a public place if another individual, such as a librarian, can document the participant's time spent making job contacts.

Require participants to provide the *Job Search Record* by the 10th calendar day following the end the month in which the participant made the job search. Examples:

- The job-search occurred in March. Expect the participant to provide the *Job Search Record* to you on or before April 10.
- The job-search occurred in June. Expect the participant to provide the *Job Search Record* to you on or before June 10.

When developing the job search plan with the participant, give thorough instructions to the participant on completion of the *Job Search Record*. Provide the participant with an adequate supply of the forms for the duration of the job search plan period. See [Individual Job Search](#) or [Structured Job Search](#), whichever applies, for more information on the job search plan.

Expect the participant to complete the form as much as possible. However, consider the participant to have met the documentation requirement if the participant has completed the following information on the *Job Search Record*:

- Sufficient information to identify the employer that was contacted or the activity that was completed,
- The date the contact was made or the activity was completed,
- The amount of time spent on the contact or activity, and
- The participant's signature.

The participant's signature on the form gives you authorization to contact any listed employer to verify the contact.

Upon receipt of the completed form, monitor the participant's progress by checking at least two contacts per week. If a participant is required to make only one contact, verify the one contact. Use your discretion to determine if you need to check additional contacts. Evaluate progress weekly unless the participant's circumstances justify less than a weekly evaluation.

Count actual time spent finding job openings, making job contacts, and travel time between job sites to determine the actual hours of participation when you find that the time reported by the participant is consistent with the type of job contact or other job search activity. Do not count travel time to the first job contact or interview in a day or travel time to return home after making the last job contact for that day as hours of participation.

Report actual hours of participation in job search activities through entry in IowaWorks as described at [Reporting Participation Hours](#). Document the entered hours in the participant's case file. Do not enter any hours that are not supported by documentation in the case file.

Follow all of the policies under [FIA Participation Issues](#) to attempt to resolve the participation issue and to determine if the participant has chosen an LBP when:

- A participant provides a *Job Search Activity Log* that includes job contacts or activities and is lacking any of the required information above for a contact or activity, or
- A participant fails to complete the required hours of job search activity as specified in the job search plan, or
- A participant failure to provide a *Job Search Activity Log* by the due date specified on the job search plan agreement.

Verifying and Projecting Employment Hours

Legal reference: 441 IAC 93.7(1); 93.10(2)

Policy: PROMISE JOBS must verify actual hours of employment at least once every six months. This applies to full-time, part-time, subsidized and on-the-job training employment. See [Self-Employment](#) for verification procedures for self-employment.

Require employed PROMISE JOBS participants to provide verification of hours of employment unless you have adequate verification from another source.

Once verified, hours of employment may be projected for up to six-months for reporting purposes. Do **not** use anticipated or scheduled hours to project hours for reporting purposes.

Procedure:

Verifying Actual Employment Hours

The referred person is responsible for providing verification of actual employment hours except when verification is available to PROMISE JOBS in WISE or from another source.

- For employed FIP applicants, ask for verification of actual employment hours during the FIA appointment.
- For participants who become employed while on FIP, ask for verification of actual employment hours when you become aware of the new employment.

Notify the referred person in writing of the need to verify hours of participation.

Include the requirement to provide verification as a step in the FIA when possible or request the verification in writing separately as described at [Written Notice to Participant](#). Allow the person at least 10 calendar days to provide the verification.

Verify hours worked within the past 30 days to project future hours. Ensure that the initial verification of hours covers at least one full week of work. For new employment, you may need to ask for verification following the second check to be more certain of verifying a full week. You must have at least one full week of actual hours to project for reporting purposes.

Acceptable verification of actual hours of work includes, but is not limited to:

- Paystubs,
- A written statement from the employer,
- Information provided by the employer based on a *Consent to Obtain and Release Information*, form 470-0429, signed by the referred person, or
- An *Employer's Statement of Earnings* signed by the referred person and completed by the employer.

PROMISE JOBS must verify actual hours of employment **at least** once every six months. Ask the participant to provide verification unless adequate verification is available in WISE or from another source.

- Verify actual hours of employment once every six months when current actual hours are indicative of hours for the next six months.
- Verify work hours more frequently if verification of actual hours is not indicative of hours for the next six months

- The frequency of verification is based on the time period that the verified hours are determined to be indicative, up to a maximum of six months.

For all employed participants, establish a schedule so that verification of employment hours is requested at least once every six months.

When the participant reports or you otherwise become aware of a change in employment, including ending employment, ask the participant to verify the changed hours unless adequate verification is available in WISE.

When the participant fails to provide verification of actual hours of employment after being notified in writing of the requirement, the participant is considered to be choosing an LBP. Follow the procedures at [FIA Participation Issues](#) to attempt to resolve the issue.

Projecting Hours of Employment

Once you have verification of actual hours of employment using information from the last 30 days, determine the projection period and a schedule for verifying actual hours in the future. You may use a minimum of one week of actual hours worked if it is indicative of future work and the hours were worked within the last 30 days.

1. Projecting for a period of six months:

Use a weekly average of verified actual hours worked in the past 30 days to project hours for the next six months if the actual hours worked within the past 30 days are a good indicator of hours for the next six months. Consider the past 30 days to be a good indicator when neither the participant nor the verification indicates that a change in hours is likely to occur in the next six months.

To monitor and track the six-month verification schedule, code IowaWORKS to alert you to request updated verification of actual work hours in the sixth month. The month for which the verification is first used for reporting purposes counts as month 1.

2. Projecting for a period of less than six months:

Use a weekly average of verified actual hours worked within the last 30 days to project for a period of less than six months when actual hours worked in the past 30 days are not a good indicator of future hours for the next six months.

Project for a period of less than six months when either the participant or verification indicates that a change in hours may occur in the next six months. This may be appropriate for new employment when the participant's hours may increase once the participant is trained. This may also be appropriate for employment with seasonal increases or decreases in hours.

Consider all of the circumstances to determine an appropriate verification schedule. Also, consider that you need to issue a written notice each time verification is needed.

To monitor and track the verification schedule, code IowaWORKS to alert you to request updated verification of actual work hours late in the month prior to the month that the next verification is needed.

EXAMPLES:

Determining how often to verify actual employment hours

1. Ms. A is employed and applying for FIP for herself and her children. Ms. A says that the last 30 days are a good indication of her hours for the next six months and provides verification. PROMISE JOBS will use the verification to project the employment hours for the next 6-months. Providing Ms. A reports no change, PROMISE JOBS will continue to verify actual hours every six months.
2. On October 16, PROMISE JOBS and Mr. T meet to renegotiate his FIA that expires October 31. Mr. T has been meeting his FIA requirements by working at a convenience store. His hours vary significantly from week-to-week and from month-to-month. PROMISE JOBS gives Mr. T a written request to provide verification within 10 calendar days of actual hours worked in the last 30 days. PROMISE JOBS uses the verification to project for only one month. PROMISE JOBS asks Mr. T to re-verify monthly.
3. Ms. F is employed and applying for FIP for herself and her children. Ms. F is unsure if her hours from the past 30 days are indicative of hours she will work in the next six months, since her employer verbally told her that she may be working more in a few months. PROMISE JOBS gives Ms. F a written request to provide verification of actual hours worked in the last 30 days. PROMISE JOBS may ask Ms. F to re-verify in one or two months to assure accuracy.

Projecting for a period of six months

On March 23, Ms. B provides two pay stubs covering two weeks each, which she received in the last 30 days. Ms. A stated that the last 30 days are a good indication of her hours for the next 6 months.

March 9th pay stub = 42 hours
March 23rd pay stub = 42 hours

Average weekly hours are 84 divided by 4 = 21 hours

PROMISE JOBS enters 21 average weekly hours for March and will use this same average to project through August.

PROMISE JOBS codes IowaWORKS to send an alert in September to request updated verification of actual hours worked in the last 30 days.

Projecting for a period of less than six months

Ms. D provides a copy of her 1st pay stub on October 11, which covers her first full week of work. Ms. D expects her weekly hours to increase after her probationary period of two months is up (October – November)

October 11th pay stub = 15 hours
Average weekly hours are 15 hours.

PROMISE JOBS enters 15 hours for October and will use this same average to project for November only.

PROMISE JOBS codes IowaWORKS to send an alert in early December to request updated verification of actual hours worked in the last 30 days.

If the updated verification of actual hours reflects hours for the next six months, PROMISE JOBS will use the actual hours for December and project through May.

Written Notice to Participant

Legal reference: 441 IAC 93.10(1)

Policy: Participants must be provided written notification of all participation requirements, including but not limited to:

- Meetings, workshops, and other activities scheduled at the PROMISE JOBS site,

- Assignment to FIA activities, including WEP and UCS work site assignments,
- Verification and documentation required of the participant,
- Participation issues.

Participants must be allowed at least 10 calendar days to:

- Appear for a meeting, activity, or worksite assignment,
- Provide required verification or documentation,
- Resolve a participation issue.

Written notice must be sent within 30 days of:

- The date of a scheduled meeting,
- The date an activity or worksite assignment will begin, or
- The due date for providing documentation.

Procedure: Notify the participant **in writing** of all scheduled meetings, activity assignments, work site assignments, and participation issues. When information or verification from the participant is needed, request the verification **in writing**.

EXCEPTION: For FIP applicants, the IM worker provides written notification of the appointment with PROMISE JOBS to write and sign the initial FIA.

Use form 470-0813, *Notice of Appointment or Participation* to:

- Notify a participant of scheduled meetings, activity assignments, and work site assignments.
- To request required documentation or verification.

You may also use a written letter when requesting documentation or verification if needed to make the expectation clear to the participant. Include the following in a letter requesting documentation or verification:

- Specify the information or items(s) needed,
- Specify the due date for return of the information.
- Explain the penalty that will occur if the participant does not comply. When a limited benefit plan will apply, you may use an attachment that describes the limited benefit plan, such as Comm. 170, *Understanding the Limited Benefit Plan*.
- Provide your name and phone number and explain what action the participant needs to take if the participant is unable to comply.
- A return envelope.

Allow participants **at least 10 calendar days** from the date the notice is mailed or given to the participant to appear for scheduled meetings, activity or work-site assignments or to provide needed documentation or verification. If the 10th calendar day falls on a weekend or holiday, allow until the next business day.

Send the *Notice of Appointment or Participation* or written letter within 30 days of:

- The date of a scheduled meeting,
- The date an activity or worksite assignment will begin, or
- The due date for providing documentation or verification.

If a participant volunteers for an appointment or to begin an activity or worksite assignment in less than 10 calendar days, verify the participant's agreement with a written statement from the participant. Document the participant's request for an earlier appointment on the notice or in the case file narrative.

Reschedule a meeting, activity, or worksite assignment upon request by the participant when the participant requests and has a valid reason for not being able to attend as originally scheduled.

Allow additional time when the participant requests more time to provide documentation or verification. Additional time may be needed when the participant must obtain an evaluation for a claimed medical condition.

Use a written reminder letter as described at [Identifying Participation Issues](#) to notify a participant of an issue with their participation in FIA activities.

Use the FIA as written notice of the need to provide documentation or verification of hours for a specific activity when:

- The need is determined during the FIA appointment or other meeting, and
- You can specify what is needed and a due date that is within 30 days of the date the FIA is signed.

You may also use the FIA as written notice of monthly verification requirements of an ongoing **current** FIA activity when the participant is currently participating in the activity or it is reasonably certain the participant will begin the activity within 30 days of the date the FIA is signed (i.e. person has been hired for employment or person is or will be enrolled in a training program).

The timeframes described in this section do not apply to the participant requirement to verify hours of participation in an FIA activity. Refer to the applicable section in [Required Verification and Documentation](#) for more information.

For individual and structured job search, use form 470-4481, *Job Search Plan Agreement* to make expectations of job search activities very clear to the participant regarding:

- The required activities related to finding job openings,
- The number of job search hours to be committed during the search period and,
- The requirement to provide documentation of job search activities.

Use form 470-0810, *Referral for Work Experience (WEP) Placement* to notify the participant of a scheduled interview with a work experience sponsor. See [Using WEP as an FIA Activity](#) for more information.

Comment: Use the following forms as written notification in the following circumstances:

Form	Purpose
470-0103 <i>Your PROMISE JOBS Reminder</i>	To remind the participant whose referral status changes from exempt to FIA-responsible of the responsibility to make and keep an appointment for PROMISE JOBS orientation.
470-0813 <i>Notice of Appointment or Participation</i>	To notify the participant of a scheduled appointment or activity. If there is not enough space to describe the reason for the appointment, you may attach a letter or speed memo.
470-0810 <i>Referral for Work Experience (WEP) Placement</i>	To inform the participant of a scheduled interview with a work experience sponsoring employer.
470-2604 <i>Transfer Between PROMISE JOBS Agencies</i>	To inform the participant when the case is transferred from one PROMISE JOBS office to another.
470-3300 <i>Your Family Investment Agreement Reminder</i>	To inform FIP participants who have signed an FIA and who experience a break in FIP assistance that they continue to be responsible for their FIA.
470-4481, <i>Job Search Plan Agreement</i>	To outline the participant's job search activities and expectations for a specific job search period.

These forms can be located in the [PROMISE JOBS Provider Manual Appendix](#).

Letters to PROMISE JOBS participants on your agency letterhead must contain two or more elements that show that the letter is from PROMISE JOBS staff and is about PROMISE JOBS issues.

These elements may include:

- Language in the text of the letter.
- A PROMISE JOBS subheading.
- Signature identifiers for PROMISE JOBS workers and supervisors.

Written Notice to Verify Employment Hours

Legal reference: 441 IAC 93.10(1)

Policy: Participants must be notified in writing of the requirement to verify hours of employment.

Use the FIA as written notice when:

- The need for verification is determined during the initial FIA appointment or FIA renegotiation appointment, and
- It is possible to specify the employer and a due date that is within 30 days of the date the FIA is signed.

In all other situations, use a letter to the participant to request verification of actual hours of employment, even if the FIA includes a general statement regarding providing verification of employment hours.

Procedure: Apply previous procedures under [Written Notice to Participant](#) when requesting verification of employment hours and the procedures below.

When writing the FIA for an employed FIP applicant, include a statement in the FIA to request the verification, specifying the current employer and that the verification is due within 10 calendar days of the FIP approval notice or within 10 calendar days of receipt of the first paycheck with at least one full week of pay, whichever is later. Also include a general statement that the FIA-responsible person will provide additional verification of employment hours as requested by PROMISE JOBS or be subject to an LBP.

If the applicant will not receive their first pay within 30 days of the date the FIA is signed, send a letter to request the verification on the day that the first pay is expected.

When writing an FIA for persons not currently employed, include a statement that the participant must provide verification of actual employment hours when requested by PROMISE JOBS or be subject to an LBP. When the participant reports or you otherwise become aware of a change in employment hours, including ending employment, send a letter to request that the participant to verify the change.

If you become aware of an employment change while meeting with a participant to negotiate an FIA, include a statement in the FIA to request the verification, specifying the current employer and a due date that is at least 10 calendar days from the date the FIA is signed.

For FIP applicants and newly employed participants who will not have verification of actual hours for one full week of work within 10 calendar days from the written request, allow 10 calendar days from the latter of the following:

- The date the desired verification will be available, or
- The date that the request is mailed or given to the participant.

For participants required to verify actual hours of employment monthly, ask the participant to provide the verification by the tenth of the month following the month the hours were worked.

Sample text for a letter to request verification of work hours follows. Adjust the text to fit the specific situation:

Sample 1 for 1st paragraph for FIP applicant:

If you are approved for FIP, your job will count as your PROMISE JOBS activity in your FIA if you send proof of your work hours.

Sample 2 for 1st paragraph for new employment:

Congratulations on your new job! Since you are still on FIP, your job will count as your PROMISE JOBS activity in your FIA if you send proof of your work hours.

Sample 3 for 1st paragraph for ongoing employment:

My file shows that you are still working. I hope your job is going well! Since you are still on FIP, your job will continue to count as your PROMISE JOBS activity in your FIA if you send proof of your work hours.

I need you to send proof of the actual number of hours you have worked in the last 30 days by ____-date-____. This proof must include at least one full week of work.

Is the actual number of hours you worked a good indication of what you will be working for the next six months? If not, please let me know what changes you expect and when.

Examples of proof are your check stubs or a statement from your employer. Call me by the above date if you do not have proof or need help getting proof.

Call me right away if you are no longer working, or if you are having problems with your job. I will try to help you deal with your problems so that you can keep your job.

If you do not provide proof by the above date, your FIP benefits will end and you will enter a Limited Benefit Plan (LBP). See the enclosed paper for more information on the LBP.

Notice of Decision

Legal reference: 441 IAC 93.10(1)“b”

Policy: Participants **must** be notified of decisions that are made in relation to their PROMISE JOBS and FIA participation. Notices inform the participant of the action being taken, inform participants of appeal rights, and specify the length of time to file appeals in a timely manner to ensure hearings will be held.

Procedure: A written notice is required in the following situations. However, the ABC system sends a *Notice of Decision* and PROMISE JOBS does **not** need to send notice to the participant:

- When FIP is canceled, the notice informs the participant that eligibility for PROMISE JOBS services has ended.
- When IM reinstates FIP without an application, the notice includes the following statement: “If you have a signed Family Investment Agreement (FIA), it is again in effect. If you do not follow through with your FIA steps you will enter a limited benefit plan. If you have questions concerning your FIA, contact your PROMISE JOBS worker.”

- When PROMISE JOBS makes entry in PJCase to issue a supportive payment, the system generates a notice of decision.

EXCEPTION: ABC does **not** issue a notice when processing entry to issue an FSSG payment.

The FIA serves as written notice of approval and assignment to PROMISE JOBS activities, including approval of a training plan. Send written notice using form 470-0602, *Notice of Decision: Services*, or form 470-4558 or 470-4558(S), *Notice of Decision: Child Care*, in accordance with HHS policies when:

- A participant's request for training is denied or canceled.
- You approve or deny an FSSG application.
- You approve, change, or cancel CCA.

Issue a notice in accordance with HHS requirements for adequate and timely notice. See [Adequate Notice](#) and [Timely Notice](#), immediately following, and 1-E, [Notice of Decision](#) for additional information.

If the participant continues with the FIA process, the FIA itself will be the only notice needed to establish PROMISE JOBS and FIA participation.

A participant has the right to appeal the contents of the *Family Investment Agreement*, form 470-3095, and *FIA Steps to Achieve Self-Sufficiency*, form 470-3096. The FIA forms notify participants of their appeal rights.

Because the participant can appeal the contents of the FIA when they disagree with PROMISE JOBS about components or activities to be included in the FIA, the participant may sign the FIA and appeal the contents without choosing the LBP.

See [PROMISE JOBS Appeal Procedures](#) for additional information on appeals.

Adequate Notice

Legal reference: 441 IAC 16.3(17A)

Policy: "Adequate notice" means a written notice that includes the following elements:

- The action taken and reasons for it.
- The PJPM section title describing the policy basis for the action.
- An explanation of the participant's right to appeal.
- The circumstances under which assistance is continued when an appeal is filed.

"Adequate notice" also means a written *Notice of Decision: Services*, form 470-0602 is sent no later than the date benefits would have been issued.

The explanation of the right to a hearing and the continuance of assistance, when applicable, are printed on the *Notice of Decision: Services*, form 470-0602.

Procedure: Issue a *Notice of Decision: Services*, form 470-0602 that meets the adequate requirements when required as described at Notice of Decision and Timely Notice.

Timely Notice

Legal reference: 441 IAC 16.3(17A)

Policy: “Timely” means that the notice is mailed at least ten calendar days before the date an adverse action would become effective. The timely notice period begins on the day after the notice is mailed.

The “timely notice period” is the time from the date a notice is mailed to the effective date of action.

An issued *Notice of Decision: Services*, form 470-0602 must meet the definition of “adequate” and “timely” except in the case of probable fraud or death of the recipient.

Procedure: When issuing a *Notice of Decision: Services*, form 470-0602 to cancel a training plan, allow at least 10 days from the date the notice is mailed to determine the effective date.

When issuing form 470-4558 or 470-4558(S), *Notice of Decision: Child Care* to cancel CCA or reduce CCA units, allow at least 10 days from the date the notice is mailed to determine the effective date.

To be timely, the notice must be mailed no later than the twentieth if there are 30 days in the month, or the twenty-first if there are 31 days in the month. (The notice must be mailed earlier in February.)

For approval or denial of assistance that is not currently being provided, the effective date is the date the action is taken. There is no timely notice period for these actions.

Records Maintenance

Legal reference: 441 IAC 93.2(239B)

PROMISE JOBS provider agencies must maintain all case files and records related to the program for three years, including records kept within the IowaWORKS system. Do not destroy any case files or records for people currently involved in a lawsuit against HHS or a PROMISE JOBS provider agency. Do not destroy any case files or records that contain an unpaid recoupment or are involved in an audit. In these instances, the case files and records must be retained for three years after the lawsuit, unpaid recoupment, or audit is resolved.

PROMISE JOBS Provider Case File Contents

This table provides the file format for paper case files and the forms and documents required in the Documents section of electronic case files in IowaWORKS.

For paper case files, file documentation and verification, using the right and left side of the file as indicated. Within each section, file the listed forms chronologically, with the oldest documents on the bottom and the newest on the top. The forms filed in a section may be interspersed with one another, provided the chronological flow is maintained.

Left Side of File Folder

I. Notices

470-3103	<i>PROMISE JOBS Reminder</i>
470-0813	<i>Notice of Appointment or Participation</i>
470-2604	<i>Transfer Between PROMISE JOBS Agencies</i>
470-0820	<i>Notice of Employment</i>
470-0602	<i>Notice of Decision: Services</i> File under applicable tab; i.e. FSSG under FSSG, Educational Plan under Educational and Training.
470-3300	<i>Your Family Investment Agreement Reminder</i> Written Reminders and any other letter used in an attempt to resolve a participation issue

II. Supportive Payments and Other Authorizations

- 470-0510 *Estimate of Cost*
470-4558 *Notice of Decision: Child Care— Optional as available in the KinderTrack system*
Special needs letter
Non-Registered Provider Interoffice Agency Referral
Child Care Assistance Change Form
470-0464 *Overpayment Recovery Information Input – Optional if available in WOPR.*
470-0465 *Overpayment Recovery Supplemental Information – Optional if available in WOPR.*
470-0010 *Adjustment to Overpayment Balance*

III. Authorization Vouchers

Invoices from educational institutions, not limited to: direct education costs for short-terms training, ESL, high school equivalency testing
Written statement declining transportation
Paperwork on lost, stolen, missing or returned warrants
Receipts and any additional information related to supportive payments
Receipts showing refunds of overpayments.

IV. Hardship Exemption (Optional. Add tab only if needed.)

File all hardship exemption documentation in this section.
This includes the six-month FIA, all correspondence, notices, expense allowance authorizations, etc.

V. FSSG (Optional to Add Tab Only if Needed)

- Application
470-0602 *Notice of Decision: Services*
Invoices
Any additional paperwork

VI. LBP (Optional to Add Tab Only If Needed)

LBP Checklist
LBP Letter
Any related LBP documents or verifications

VII. Appeal (Optional to Add Tab Only If Needed)

- 470-0487 *Appeal and Request for Hearing*
Appeal Summary
470-0492 *Request for Withdrawal of Appeal*
Any accompanying verification presented during hearing, not already contained in the case file in this section

Right Side of File Folder

Face Sheet – No Tab

Can use any one of the following, keeping the most current only:

- FET
- IowaWorks Seeker
- IowaWorks Transcript

I. Narrative

Narrative reports must contain sufficient information to explain any circumstance that is not clearly documented by forms or letters contained elsewhere in the file. Documentation of office visits, pertinent telephone conversations, failure to appear for scheduled appointments, and failure to contact the office regarding a valid reason for failure to appear is very important.

II. Family Investment Agreement

470-3095 *Family Investment Agreement*

470-3096 *FIA Steps to Achieve Self-Sufficiency*

470-3104 *Your FIA Rights and Responsibilities*

FIA Progress Review – Only when FIA has not been renegotiated within the past 6 months. Keep most current only.

III. Assessments and Evaluations

470-0806 *PROMISE JOBS Stepping Stones to Family Success*

NOTE: File educational assessments under Education and Training, medical evaluations under Medical and other assessment or evaluations under their applicable tab. File any remaining tests and other documentation used to evaluate a participant's potential in this section.

IV. Employment

470-2844 *Employer's Statement of Earnings*
470-0429 *Consent to Obtain and Release Information*
470-0820 *Notice of Employment*
Verification of actual work hours, such as but not limited to, pay-stubs or written statements from the employer

V. Work Readiness

470-4481 *Job Search Plan Agreement*
470-3099 *Job Search Record*
470-2617 *Time and Attendance*
Documentation of Workshop Attendance and Completion

VI. Education and Training

470-2617 *Time and Attendance*
Educational Evaluation Information
Class Schedules
Grade Reports
Statements from Academic Advisors
Financial Resource Information
Labor Market Statistics
470-0602 *Notice of Decision: Services*
Notification of Academic Probation
Information regarding Parenting Classes
Any other education and training information

VII. WEP/UCS/OJT

470-0810 *Referral for Work Experience (WEP) Placement*
470-0805 *Work Experience Participant Evaluation*
470-2617 *Time and Attendance*
470-0429 *Consent to Obtain and Release Information*
Background Checks
Any documentation pertaining to Work Experience Placement, Unpaid Community Service or On-the-Job Training

VIII. Joint Plans

FaDSS Referral Form
FaDSS Monthly PJ Report
Referrals to Other Agencies

NOTE: Use this section for, but not limited to: FaDSS, Vocational Rehabilitation, Head Start, all IWD Programs including Workforce Innovation and Opportunity Act (WIOA), youth programs, RES.

IX. Medical (Optional to Add Tab Only If Needed)

470-0447 *Report on Incapacity*
470-0429 *Consent to Obtain and Release Information*
 Medical Professional's Written Excuses
470-2617 *Time and Attendance*
 Documentation related the medical conditions, such
 as but not limited to: Mental Health, Substance
 Abuse, Other Rehabilitative Services

X. Correspondence/Other

470-0429 *Consent to Obtain and Release Information* other
 than those pertaining to another section of the file
 All pertinent information not previously covered
 Any remaining correspondence to and from the
 participant or others pertinent to this participant that
 do not pertain to another section of the file

Reporting Requirements

Legal reference: 45 CFR 261.61

The following sections explain reporting requirements relating to:

- [Reporting Participation Hours](#)
- [Reporting Excused Absence and Holiday Hours](#)
- [Beginning employment to IM](#)
- [Sharing disability information with IM](#)

Reporting Participation Hours

Legal reference: 45 CFR 261.61

Policy: For activities other than unsupervised study time for basic educational and postsecondary education activities, actual hours of participation in FIA activities must be verified.

For employment, actual hours must be verified and used to project average weekly hours for up to six months.

For basic educational and postsecondary education activities, actual hours of attendance in class, labs and supervised study time must be verified by the training provider as described at Basic Education Services and Postsecondary education.

EXCEPTION: If the participant is under age 20 and in high school or high school equivalency, the participant can verify the hours.

The total number of hours spent in supervised and unsupervised study for basic and postsecondary education may not exceed the number of hours required or advised by the educational program.

Verified actual hours of participation must be entered in IowaWORKS for all activities. For employment, verified actual hours are used to project average weekly hours for entry in IowaWORKS.

This allows IWD to prepare and send monthly data files to HHS for reporting purposes.

Procedure: For FIA activities other than unsupervised study time for basic educational and postsecondary education activities, enter verified actual hours of participation for each week in the IowaWORKS system. Do not enter any hours of participation that are not verified. Do not enter anticipated or scheduled hours of participation.

For employment, verify hours of participation and project average weekly hours for up to six months as described at [Verifying and Projecting Employment Hours](#). Once verified, enter projected average weekly hours in IowaWORKS. Do **not** enter projected hours that have not been verified.

For basic educational and postsecondary education activities, obtain the study time requirements for the program of study from the educational facility and document the appropriate study time requirements in the case file. Enter verified actual hours of attendance in class, labs and supervised study time in IowaWORKS. You may also enter up to one of unsupervised study time for each hour of scheduled class time. Do not:

- Consider credit hours when determining how many hours of unsupervised study time you may enter.
- Enter study time hours that exceed the number of hours required or advised by the educational program.

EXAMPLES:

1. Person is taking 3 classes:

- Two meet 3 hours per week.
- One meets 5 hours per week.

Total weekly class hours: $3+3+5=11$.

Total Study Time Limit: Educational provider says the program requires 2 hours of study time for each hour of class time to maintain good grades. $2 \times 11=22$ hours per week.

Supervised study time: The educational provider verifies 11 hours of supervised study time per week on the Time and Attendance form provided by the participant.

Unsupervised homework study time: Up to an additional 11 hours of unsupervised homework study time can be reported: 22 hours required for program – 11 supervised = 11.

2. Person has the same class schedule as example one.

Total weekly class hours: $3+3+5=11$.

Total Study Time Limit: Educational provider says the program requires 1 hour of study time for each hour of class time to maintain good grades, or 11 hours per week.

Supervised study time: The educational provider verifies 5 hours of supervised study time per week on the Time and Attendance form provided by the participant = 16 hours.

Unsupervised homework study time:

Up to an additional 6 hours of unsupervised homework study time can be reported: 11 hours required for program – 5 supervised = 6 unsupervised.

Reporting Excused Absence and Holiday Hours

Policy: For activities other than employment, PROMISE JOBS may report any scheduled hours that the participant did not attend due to an excused absence or holiday in IowaWORKS.

Excused absences and holidays are not applicable to employment since employment hours are projected.

Procedure: When a participant is scheduled for an FIA activity, and the participant does not attend the activity due to an excused absence or holiday, report the actual hours that are excused for the week for specific activity in IowaWORKS.

Consider an absence from an FIA activity other than employment for any of the following reasons to be an excused absence:

- Illness.
- Court-appearance. (Mandatory for participant, participant spouse, or participant child)
- Attendance at school functions for children, i.e. parent/teacher conferences.
- Attendance at required meetings with HHS or IWD.
- Required in the home due to illness of another family member.
- Family emergency, using reasonable standards of an employer.
- Bad weather, using reasonable standards of an employer.
- Absent or late due to a participant's or spouse's job interview, when the hours cannot be counted as job search.
- Leave due to the birth of a child. When a child is born or joins a family through adoption or foster care after referral, necessary absence shall be determined in accordance with the Family Medical Leave Act of 1993.

Report actual hours missed when the participant was scheduled for an activity other than employment and was absent due to one of the following 10 allowable holidays:

- New Year's Day
- Martin Luther King Day
- President's Day
- Memorial Day
- 4th of July
- Labor Day
- Veterans Day
- Thanksgiving
- Day after Thanksgiving
- Christmas

Do not report hours of absence due to holidays other than those specified above. Report the number of hours missed due to these holidays when the participant would otherwise be scheduled for a PROMISE JOBS activity as designated in their FIA, including when the worksite, training facility, or activity-site:

- Is closed due to a holiday, or
- Is open on a given holiday and allows the participant to take their normally scheduled hours off on a different day, in order for the work, training, or activity to continue despite the holiday.

Reporting Employment to IM

Legal reference: 441 IAC 41.27(239B) and 41.27(2)

Policy: All income earned from work shall be applied to reduce the cost of FIP paid to the FIP family according to FIP policy. This is the responsibility of the IM worker.

Procedure: When you become aware that a PROMISE JOBS participant has started, stopped, or changed employment, check WISE to determine if IM has verification of the change. If WISE has no verification of the change, report the change to the IM Customer Support Center (IMCSC) as follows:

- Complete form 470-0820, *Notice of Employment* with all information known and send via email to IMCSC.
- If available, also send a copy of form 470-2844, *Employer's Statement of Earnings*, letter from the employer, paystubs, or other acceptable verification of employment.

IMCSC email: imcsc@hhs.iowa.gov.

The IM worker verifies the information on the *Notice of Employment* and changes the participant's FIP grant, if appropriate.

When an IM worker becomes aware that a PROMISE JOBS participant started, ended, or changed employment, IM will notify PROMISE JOBS of the change. PROMISE JOBS must verify the employment change following the policies described at [Verifying and Projecting Employment Hours](#).

Reporting Disability Information to IM

Legal reference: 441 IAC 41.27(1)"g" and "i", 93.2(2), 93.4(5)

Policy: FIP applicants and participants are required to apply for SSD or SSI when the customer reports a physical or mental disability that is expected to last for more than 12 consecutive months or is expected to result in death and that they are unable to engage in substantial activity due to the disability.

Procedure: Notify IM when a participant provides medical documentation, such as form 470-0447, *Report of Incapacity*, of a disability that is expected to last for 12 consecutive months or is expected to result in death. To notify IM, scan, and email form 470-0447, *Report of Incapacity*, or other acceptable medical verification to the appropriate IM imaging center. Ensure that the participant's case number, state ID, and IM worker number are on the documentation.

FIA Participation Issues

Legal reference: 441 IAC 93.13(239B)

Policy: PROMISE JOBS participants who do not carry out the responsibilities of the FIA are considered to have chosen the LBP.

Procedure: When participant issues and other circumstances seem to indicate that a person is choosing an LBP as described in any of the FIA participation policies, attempt to resolve the participation issue. Make every effort to:

- Negotiate for a solution.
- Clarify expectations.
- Identify barriers to participation that should be addressed in the FIA.

A participant's signature on an FIA is a written commitment to the activities outlined in the agreement, and an acceptance of the PROMISE JOBS services available for those activities.

FIP participants who choose an LBP after signing an FIA incur a greater consequence than those who choose an LBP before signing an FIA. They become ineligible for the PROMISE JOBS services outlined in the FIA as well as for FIP benefits.

For this reason, make strong efforts to ensure that participants:

- Understand the expectations.
- Have not mistakenly or lightly chosen the LBP.
- Understand the seriousness of the choice of the LBP.
- Understand that they may involve the PROMISE JOBS supervisor at any time to discuss problems or questions.

Follow the policies under [Identifying Participation Issues](#) regarding written reminders, requests, and letters. Use communication as personal as possible and as detailed as needed to ensure that the participant understands which action or inaction is indicating choice of the LBP.

These steps will ensure that the case file contains clear documentation of the participant's choice of the LBP, including your efforts to contact the participant by telephone or to set up face-to-face interviews. These steps will either bring the participant back into the FIA process or clearly establish the choice of the LBP.

Remember that participants may take advantage of the opportunity to discuss participation problems or questions with a PROMISE JOBS supervisor at any time. This applies to all aspects of developing and following through with the FIA.

Use the process described at [Informal Dispute Resolution Process](#) when a participant is not satisfied with the contents of the FIA. If the participant meets with the supervisor and is still not satisfied with the FIA contents, appeal is the next step. See a discussion of this under [PROMISE JOBS Appeal Procedures](#).

Participant actions that are considered to provide evidence that a participant is not carrying out FIA responsibilities are described under [Identifying Participation Issues](#) and [Participation Issues Specific to Classroom Training](#).

Other actions that are considered to indicate choice of the LBP are described specifically in PROMISE JOBS policies found under the following headings:

- [Family Investment Agreement](#), including [FIA Options for Clients Aged 19 or Younger](#) and [Renegotiation and Amendment of the FIA](#)
- [Refusing, Ending or Reducing Employment](#)
- [Required Verification and Documentation](#)

Temporary problems that can excuse these actions are listed under [Problems With Participation](#). Problems of a more serious or long-term nature are described under [Barriers to Participation](#). These may indicate a need to renegotiate the FIA, rather than choice of the LBP.

The participant needs to resolve the participation issue by either resuming the steps of the FIA or by revealing a problem or barrier that excuses the participation issue.

If the issue is not resolved after you have followed the policies under [Identifying Participation Issues](#), consider that the participant has chosen the LBP. Refer the case for review as described at [Review of Limited Benefit Plan Recommendation](#).

A description of the LBP and of the process for initiating the LBP is found under [Limited Benefit Plan \(LBP\)](#). See [Reconsidering an Active Limited Benefit Plan](#) for information on reconsideration opportunities available to the participant after imposition of an LBP.

The following sections address:

- [Identifying Participation Issues](#)
- [Problems With Participation](#)
- [Barriers to Participation](#)

Identifying Participation Issues

Legal reference: 441 IAC 93.13(2)

Policy: The participation issues listed below are important to the process of developing and signing the FIA. They reflect the reality of the world of work and training.

These issues are part of effective functioning in the workplace or training facility and, therefore, important to carrying out the steps of the FIA.

Policy: Problems described under [Problems With Participation](#) may provide an acceptable reason to excuse participants from the consequences of these actions. Barriers to participation may be revealed that need to be addressed by renegotiating and amending the FIA. If neither of these apply, participants who do not resolve these issues are considered to have chosen the LBP.

When participation has become an issue, attempt to resolve the issue. Send a written reminder, request, or letter that:

- Identifies the participation issue,
- Clarifies expectations,
- Attempts to identify barriers to participation, and
- Offers supervisory intervention.

When sending an appointment notice to give the participant another opportunity to participate in an activity or to discuss a participation problem, include the written reminder, request, or letter with the appointment notice. Include an explanation of the LBP with the written reminder, request, or letter, either by:

- Describing the LBP in the text of the reminder, request, or letter, or
- Attaching Comm. 170, "Understanding the Limited Benefit Plan," or
- Sending form 470-0813, *Notice of Appointment or Participation*, which includes an explanation of the LBP, when an appointment is appropriate.

The following list gives the specific issues that demonstrate that a person has chosen an LBP by not carrying out the FIA responsibilities. It includes a brief discussion of the issues and gives some examples of an occurrence and how it can be handled. The examples do not address all situations under which an issue might occur. Use them as illustration for attempting to resolve a participation issue.

1. Participants who are more than 15 minutes late for a third time within three months of the first lateness, after receiving a written reminder when the second lateness occurred.

This issue applies to all PROMISE JOBS activities, but most activities that occur in a PROMISE JOBS office do not last three months. If monitored employment is the activity, the employer will probably deal with the issue without assistance from PROMISE JOBS.

This could occur in WEP if the work site sponsor notifies PROMISE JOBS that the participant is in danger of losing the WEP assignment due to lateness. Expect that the WEP work site supervisor will apply the reasonable standards of an employer to the reasons for lateness before referring the problem to you.

When a participant has been more than 15 minutes late a second time and it is within three months of the first occurrence, attempt to resolve the issue by sending a written reminder letter to the participant. Specify that they seem to be choosing the LBP due to their lateness. Communication example:

Your WEP supervisor at the Department of XX told me that you were more than 15 minutes late for your WEP assignment on Monday, xx/xx/xx. She said this is the second time since you started your WEP on xx/xx/xx that you have been more than 15 minutes late. She told me she talked with you about this problem the first time. She would not like to see you lose your WEP position and choose the limited benefit plan due to this problem.

I need to remind you that if this happens again, you will be choosing the limited benefit plan. Being at work on time is one of the first responsibilities of an employee. Remember, we talked about following the rules of the place where you work as one of the most important parts of your family investment agreement, and that you would be choosing the limited benefit plan if you didn't follow those rules.

Please see the attached explanation of the limited benefit plan. If you have problems with this assignment or you think you have problems that should be included in your family investment agreement, please call me at xxx-xxx-xxxx for an appointment so I can help you.

If you would like to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

If the WEP sponsor notifies you of a subsequent lateness within the three-month period, consider that the participant has chosen the LBP. Refer the case for a review as described at [Review of Limited Benefit Plan Recommendation](#).

2. Participants who do not appear for scheduled appointments for a second time after receiving a written reminder at the first occurrence.

Attempt to resolve the issue at the first occurrence by sending a written reminder letter to the participant, stating that the failure to appear seems to indicate choice of the LBP.

Communication example:

You did not attend your appointment on xx/xx/xx to _____. It looks like you are abandoning your family investment agreement and choosing the limited benefit plan.

I have set up another appointment for you so you can continue to work on the activities in your family investment agreement. If you do not attend the appointment, we will begin your limited benefit plan. The limited benefit plan is explained on the attached appointment letter.

If you have problems that need to be included in your family investment agreement, please call me at xxx-xxx-xxxx for an appointment so I can help you.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

When the purpose of the appointment is so clear that checking the applicable box on the *Notice of Appointment or Participation* tells a complete story of what is needed (e.g., assessment), then a participant has demonstrated choice of the LBP by failing to attend the second appointment.

Do not use failure to attend a second appointment to indicate the choice of the LBP when there is another more concrete issue that should be addressed. This applies especially to participants who seem to have abandoned the FIA. See some of the following discussions for illustration.

3. Participants who do not participate in assessment activities, complete or provide required forms, or take required vocational or aptitude tests for a second time after receiving a written reminder at the first occurrence.

Attempt to resolve the issue at the first occurrence by sending a written reminder letter to the participant, specifying the issue that seems to indicate choice of the LBP.

Communication example:

On XX/XX/XX. I sent you an Employer's Statement of Earnings, asked that you have the form completed by your new employer, and return to me by XX/XX/XXXX. I have not received the completed form from you.

PROMISE JOBS participants are required to verify their actual hours of employment. You appear to be choosing the limited benefit plan because you have not returned the form. I have enclosed another Employer's Statement of Earnings form. Please sign, have the form completed by your employer and return to me by XX/XX/XXXX.

Information about the limited benefit plan is attached. If we don't have the form by xx/xx/xx and return to work on getting your family investment agreement signed, we will begin your limited benefit plan.

If you have problems that need to be included in your family investment agreement, please call me at xxx-xxx-xxxx for an appointment so I can help you.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

If you need to create an appointment for the participant at the same time you are stating the issues above, you may attach your letter to the appointment form.

4. Participants who are absent from activities designated in the FIA or other self-sufficiency plan for a second time after receiving a written reminder at the first occurrence.

Attempt to resolve the issue at the first occurrence by sending a written reminder letter to the participant, specifying the issue that seems to indicate choice of the LBP.

Again, if you are setting up an appointment at the same time, attach the letter to the appointment form, so there is no doubt that the participant understands the issue that indicates choice of the LBP. In that way, the appointment form describes the LBP and you would not have to describe it in your letter.

Communication example:

You did not attend your job-seeking skills classes beginning xx/xx/xx. It looks like you are abandoning your family investment agreement of xx/xx/xx and choosing the limited benefit plan.

We have scheduled another session of job-seeking skills classes for you so you can continue to work on the activities in your family investment agreement. If you do not attend the classes, we will begin your limited benefit plan. The limited benefit plan is explained in the attached appointment letter.

If you have problems that need to be included in your family investment agreement, please call me at xxx-xxx-xxxx for an appointment so I can help you.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

The following communication example includes both [Issue 3](#) and [Issue 4](#) above. It can also be applied to [Issue 9](#):

You have not returned your time and attendance forms for your HSED classes for the month of October. The HSED staff at XXCC told me that you have not attended classes for two weeks. This means that you are choosing the limited benefit plan in two ways:

- Not returning the required forms.
- Not attending your HSED activity as shown in your family investment agreement.

I have scheduled an appointment for you so we can talk about ways for you to continue to work on the activities in your family investment agreement.

If you have problems that need to be included in your family investment agreement, please tell me so that I can help you. We can talk about them at your appointment and decide if your family investment agreement should be changed to fit your situation better.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

NOTE: For Issues 2, 3, and 4, if the participant fails a second time, consider that the participant has chosen the LBP. Refer the case for review as described at [Review of Limited Benefit Plan Recommendation](#).

5. Participants who do not notify work experience sponsors or PROMISE JOBS staff of absence within one hour of the time when they are due to appear for a second time after receiving written reminder at the first occurrence.

At any time that you learn that a WEP participant has failed to notify the sponsor of absence in a timely manner, write to the participant stating the participation issue. Inform the participant that a second occurrence will mean that the participant has chosen the LBP. Communication example:

Your WEP supervisor at the Department of XX told me that you were absent from your WEP assignment on Monday, xx/xx/xx, and did not notify her of your need to be absent until noon of that day. I need to remind you that if this happens again, you will be choosing the limited benefit plan.

Remember we talked about following the rules of the place where you work as one of the most important parts of your family investment agreement, and that you would be choosing the limited benefit plan if you didn't follow those rules. If you have problems with this assignment or other problems that need to be in your family investment agreement, please call me for an appointment so I can help you.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

If the WEP sponsor notifies you of a subsequent absence without timely notification, consider that the participant has chosen the LBP. Refer the case for review as described at [Review of Limited Benefit Plan Recommendation](#).

6. Participants who exhibit disruptive behavior for a second time after receiving a written reminder at the first occurrence.

"Disruptive behavior" means the participant hinders the performance of other participants or staff, refuses to follow instructions, uses abusive language, or is under the influence of alcohol or drugs.

Whenever the behavior of a participant is disruptive or otherwise offensive, whether in the PROMISE JOBS office or during activities in the community, immediately send a written reminder of these policies to the participant. This documents the incident and the written reminder, so that any subsequent occurrence can clearly be considered choosing the LBP.

Communication example:

You caused serious problems in job-seeking skills class on xx/xx/xx by loudly interrupting the instructor to ask, over and over again, why you had to be at this class, why you had to do these exercises, and other similar questions. When the instructor asked you to participate quietly for the sake of others in the class, you refused.

When I met with you to ask how we could make the classes acceptable to you, you stated that you felt that the whole family investment agreement process was just wrong, and that you didn't have any suggestions to make.

I explained to you that disruptive behavior could not be tolerated in any PROMISE JOBS activity. This is one of the rules that applies in any work place and so it also applies to PROMISE JOBS. I reminded you that if you act again in this manner, you are choosing the limited benefit plan. You then left my office and did not return to the job-seeking skills class.

I must make it clear that you have only two options at this time:

- Return to the next session of job-seeking skills classes (the current activity on the family investment agreement that you signed) and participate fully without causing problems in the class; or
- Ask to have your family investment agreement renegotiated and amended if you believe that the family investment agreement steps are no longer right for you or if you have problems that we need to include in your family investment agreement steps.

If you do not do one of these, you are choosing the limited benefit plan.

An appointment notice for job-seeking skills classes is included. Please note that it tells you about the limited benefit plan.

If you wish to talk about including problems in the family investment agreement, please call xxx-xxx-xxxx to schedule an appointment to do this. If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

If, at any future time, you cause problems in any PROMISE JOBS activity such as you did on xx/xx/xx, you will be choosing the limited benefit plan.

If the disruptive behavior occurs again, consider that the participant has chosen the LBP. Refer the case for a review as described at [Review of Limited Benefit Plan Recommendation](#).

7. Participants whose performance continues to be unsatisfactory after being notified of unacceptable performance and what is necessary to make performance acceptable.

Satisfactory performance in classroom training activities is usually determined by the training facility and is dealt with under [Standards for Satisfactory Participation](#).

There will be times in other FIA activities when you are aware of unsatisfactory performance by a participant. This might take the form of failing to carry out the scope of a job search plan, even though job search documentation is provided, failing to give serious effort in taking vocational or aptitude tests, or failure to carry out assessment activities in the FIA.

When you first become aware of participant's unsatisfactory performance in an FIA activity, attempt to resolve the issue by sending a written reminder letter to the participant, stating that the performance seems to indicate choice of the LBP.

Communication example:

This is a written follow-up of our conversation during your office visit today about unsatisfactory performance in job search activities.

It looks like you are choosing the limited benefit plan, since you did not carry out your individual job search plan as we developed your written plan for the period of xx/xx/xx through xx/xx/xx. I received your *Job Search Record* for that week, but it does not show that you contacted the employers that you had indicated in your plan.

You will remember that the employers included in your plan were those who are known to have job openings at this time. This is not true of most of the employers on your *Job Search Record*.

If your next *Job Search Record* does not show that you are following your individual job search plan, contacting employers who have job openings, you will have chosen the limited benefit plan. Please see the explanation of the limited benefit plan on the attached appointment letter for our meeting next week.

If you have problems that need to be included in your family investment agreement, please call me at xxx-xxx-xxxx so I can help you. We can talk about them and decide if your family investment agreement should be changed to fit your situation better.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

Good luck in your search. Be sure to call me right away if you are offered a job before our next meeting.

If the participant's performance does not become acceptable, consider the participant to have chosen the LBP. Refer the case for a review as described at [Review of Limited Benefit Plan Recommendation](#).

8. Participants who make physical threats to other participants or staff.

A "physical threat" is defined as having a dangerous weapon in one's possession and either threatening with or using the weapon, or committing assault. Consider a participant who makes a physical threat in the PROMISE JOBS environment to have chosen the LBP.

At the time of occurrence, attempt to resolve the issue by sending a letter to the participant, stating that the participant has chosen the LBP by making the threat. Allow the person at least five working days to respond to the letter. If you choose, a supervisor may send the letter.

Communication example:

On xx/xx/xx, you showed a knife during the PROMISE JOBS group assessment and threatened to “cause trouble...” if you were required to continue in PROMISE JOBS. Police were called and you left the office before they arrived.

Because you had a weapon and made threatening statements, you have chosen the limited benefit plan. You will have the limited benefit plan unless you can:

- Prove that you had a temporary problem that caused this threatening act, or
- Prove that you have a serious problem or barrier to participation that caused you to act this way and that we need to put into your Family Investment Agreement, or
- Provide a believable assurance that you will not threaten or endanger PROMISE JOBS staff and participants again.

We need to get a statement about one of these from a doctor, a licensed psychologist, a probation officer, or law enforcement official by _____, or the limited benefit plan will be started for you and your family.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

9. Participants who do not appear for work experience placement assignments when the WEP is part of the FIA.

This includes situations where the participant has been interviewed and accepted by the work site sponsor and the participant then “does not accept” the WEP assignment. This can be indicated either by actual statement to the work site sponsor or to PROMISE JOBS staff, or by failure to appear at the work site. If either action occurs, the participant has chosen the LBP.

Be certain that every participant who includes WEP in the FIA is informed that failure to accept and follow-up on the assignment indicates a clear choice of the LBP. This can be done:

- Orally when the WEP is included in the FIA.
- In writing when the *Referral for Work Experience (WEP) Placement* is completed and given to the participant.

Note that there is no provision for a written reminder at the first occurrence. This policy is parallel to [Issue 11](#), since similar standards exist for the WEP assignment and paid employment. Always follow the policies found under [Problems With Participation](#) and [Barriers to Participation](#).

When a participant does not appear for a WEP assignment, consider the participant to have chosen an LBP. Use a written letter to clearly establish the LBP choice, try to identify problems and barriers, and offer supervisory intervention. You may schedule an appointment to discuss the letter or allow the person at least five working days to respond to the letter. Communication example:

You have chosen the limited benefit plan because you did not accept the work experience position that was offered to you at the Department of XXX. You will have chosen the limited benefit plan unless you have a temporary problem that is keeping you from taking that position.

If you have any serious problems or barriers to participation that we need to get into your family investment agreement, that might make a difference. I have scheduled an appointment for you so we can talk about these things. Please see the explanation of the limited benefit plan on the appointment letter.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

10. Participants who do not appear for WEP interviews for a second time after receiving written reminder of the importance of complying with the FIA at the first occurrence.

A written reminder to attempt to resolve the issue and to offer supervisory intervention is the first step.

Communication example:

It looks like you are choosing the limited benefit plan because you did not keep your work experience placement interview appointment with Ms. B at the Department of XXX. You will remember that you received a copy of *Referral for Work Experience (WEP) Placement* setting up your appointment on xx/xx/xx.

Based on our telephone conversation, I have scheduled another interview for you with Ms. B so you can continue to work on the work experience activities in your family investment agreement.

Your new *Referral for Work Experience (WEP) Placement* is enclosed. If you have reasons why you think this work experience placement is not right for you, if you have other problems that we need to include in your family investment agreement, call me at xxx-xxx-xxxx, so I can help you.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

If you don't attend the new appointment with Ms. B, you are choosing the limited benefit plan. Please see the attached explanation of the limited benefit plan.

11. Participants who do not follow-up on PROMISE JOBS job referrals or who refuse offers of employment or end employment, including discharges due to the participant's misconduct.

Be certain that every participant who receives a specific job referral is informed that a failure to follow-up on that referral indicates a clear choice of the LBP.

This can be done during orientation when *Your FIA Rights and Responsibilities* is reviewed. You can also use a reminder of this policy and an explanation of the LBP with any job referral form that you use.

When a participant does not follow-up on PROMISE JOBS job referrals, refuses an offer of employment, or causes employment to end by quitting or with misconduct, determine if the person is excused from the employment issue due to a problem or barrier to participation. See [Refusing, Ending, or Reducing Employment](#), [Problems With Participation](#), and [Barriers to Participation](#).

If you determine that the person is not excused for the employment issue, the participant is considered to have chosen an LBP. Use a written letter to clearly establish the LBP choice, to attempt to identify problems and barriers, and to offer supervisory intervention.

The letter must tell the participant that if the job in question is still open and the participant returns to the job, or if the participant has started another job equal to the job in question, the issue will be resolved when PROMISE JOBS receives verification. You may either schedule an appointment to discuss the issue further or allow the person **at least 10 calendar days** to respond to the letter.

12. Participants who do not secure adequate child care when registered or licensed facilities are available.

Participants must always have adequate child care available to them before any participation requirements apply. Participants have the right to select their own child care provider, based on the child care setting they prefer, when the provider is otherwise eligible to provide child care assistance. For more information, see [Child Care Assistance](#).

However, participants cannot use lack of child care as a barrier to participation when it is documented that a space in a licensed child-care center or a state-registered child-care home is available to them.

For example, a participant can be expected to accept an available space in a registered child-care home, even when a child-care center is preferred, if no space is available in a center. You can continue to make appropriate referrals, such as child care resource and referral agencies, to help the participant find the preferred care setting.

When a participant does not secure adequate child care when registered or licensed facilities are available, consider the participant to have chosen an LBP. Use a written letter to clearly establish the LBP choice, to attempt to identify barriers, and to offer supervisory intervention.

You may either schedule an appointment to discuss the letter or allow the person at least 10 calendar days to respond to the letter.

Communication example:

You appear to be choosing the limited benefit plan because you will not accept the child care space that is available for your son at Ms. A's child-care home. Remember that finding child care for your son was the first problem to be solved on your family investment agreement. Therefore, you must take the steps available to solve that problem.

We understand that you prefer a child-care center. We will help you all we can so you can find a licensed center. In the meantime, you must accept the registered child-care home, or you will be choosing the limited benefit plan. If you find another provider that you prefer, you are free to use that provider.

I have set up an appointment for you so that we can talk about when you can begin the next step of your family investment agreement while using Ms. A's child care services. We can also talk about any problems you have that we need to include in the family investment agreement. Please note that the limited benefit plan is explained on the appointment letter.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

13. Participants for whom child care, transportation, or educational services become unavailable as a result of failure to use PROMISE JOBS funds or Child Care Assistance funds to pay the provider or failure to provide required receipts.

In this situation, the participant is considered to have chosen an LBP at the first occurrence. Use a written letter to clearly establish the LBP choice, to attempt to identify barriers, and to offer supervisory intervention. You may either schedule an appointment to discuss the letter or allow the person at least 10 calendar days to respond to the letter.

14. FIA-responsible people who are required to participate in high school completion activities and fail to provide grade transcripts or reports.

In this situation, the participant is considered to have chosen an LBP at the first occurrence. Use a written letter to clearly establish the LBP choice, to attempt to identify barriers, and to offer supervisory intervention. You may either schedule an appointment to discuss the letter or allow the person at least 10 calendar days to respond to the letter.

15. Participants who do not appear for an appointment to discuss renegotiation of the FIA, or who otherwise fail to cooperate in the renegotiation process, after receiving a written reminder at the first occurrence.

Attempt to resolve the issue at the first occurrence by sending a written reminder letter, stating that the failure to appear or to cooperate seems to indicate choice of the LBP. If the issue is failure to appear for an appointment to discuss renegotiation of the FIA, use the communication example for [Issue 2](#) for guidance when sending the written reminder letter.

Use the following communication example for guidance when sending the written reminder letter when a participant otherwise fails to cooperate in the renegotiation process (e.g., when a participant appears for the appointment to discuss renegotiation of the FIA, but refuses to agree to FIA activities that are within policy).

Your existing family investment agreement will expire on xx/xx/xx and you are still receiving FIP benefits. It appears that you are choosing the limited benefit plan, as you are not cooperating in the process to write a family investment agreement with new activities.

If you change your mind and are willing to work with PROMISE JOBS to write a new family investment agreement, you must contact me no later than xx/xx/xx. If you have problems that need to be included in your family investment agreement, please call me at xxx-xxx-xxxx for an appointment so I can help you.

If you want to talk with a PROMISE JOBS supervisor about any problems or questions you have, call xxx-xxx-xxxx for an appointment.

Problems With Participation

Legal reference: 441 IAC 93.14(239B)

Policy: Participants who are experiencing problems with participation may be excused for not attending activities as stated in the FIA and for reducing, refusing, or ending employment, including discharges due to misconduct.

Procedure: The table that follows lists temporary or incidental problems that allow participation to be easily resumed. These are, therefore, reasons why a participant can be excused from PROMISE JOBS activities and reasons for excusing a participant who reduces, refuses, or ends employment, including discharges due to misconduct.

- If Column 1 (labeled “PJ”) is checked, the circumstance is an acceptable reason for excusing a client from PROMISE JOBS activity.
- If Column 2 (labeled “Work”) is checked, the circumstance is an acceptable reason for excusing a client who refuses, reduces, or ends employment.
- Some types of circumstances are reasons for both excusing a participant from PJ activities **and** excusing a client for reducing, refusing, or ending employment.

A participant who has been excused still retains their FIA-responsible participant status, regardless of the reason.

There may be other circumstances not listed in the table in which forcing participant to participate would prevent them from becoming self-sufficient. Follow your local office procedure to notify IWD central office for review and possible resolution. If it is not resolved, IWD central office will refer the situation to HHS. The administrator of the Financial, Food, and Work Supports bureau at HHS will make the final decision.

See [Required Verification and Documentation](#) for information on verifying problems with participation.

PJ	Work	Circumstance
√	√	The travel required from home to the work assignment, job, or unpaid community service site takes over one hour each way, including time needed to take a child to child care.
	√	The work offered is at a site subject to a strike or lockout. If the strike has been enjoined under Section 208 of the Labor-Management Relations Act (commonly known as the Taft-Hartley Act), or if an injunction has been issued under Section 10 of the Railway Labor Act, the participant may not refuse employment.
√	√	The job violates state or federal health and safety standards.
√	√	Workers' compensation is not provided.
√	√	The job is contrary to the participant's religious or ethical beliefs.
√	√	The participant is required to join, resign, or refrain from joining a legitimate labor organization.
√	√	The work requirements are beyond the mental or physical capabilities of the participant, as documented by reliable evidence.
√	√	There is discrimination by an employer based on age, race, sex, color, handicap, religion, national origin, or political beliefs.
√	√	Work demands or conditions make employment unreasonable, such as working without being paid on schedule.
√	√	There are circumstances beyond the control of the participant, such as disruption of regular mail delivery.

PJ	Work	Circumstance
	√	The change or termination is part of the FIA.
	√	The job does not pay at least the minimum amount that is customary for the same work in the community.
	√	The participant takes a job that provides better pay, even though the hours of employment may be less than the current job. “Better-paying” can be on either an hourly or a monthly basis.
	√	Accepting employment would result in a net loss of cash income to the participant’s family. <i>Net loss of cash income</i> means the family’s gross income, less necessary work-related expenses, is less than the cash assistance the participant was receiving at the time the offer of employment is made. <i>Gross income</i> may include earnings, unearned income, cash assistance, etc. It does not include SNAP benefits and in-kind income (e.g., managing an apartment building in exchange for free rent). Use the family’s actual work-related expenses rather than the standard deductions. Work with IM to find out if there is other income being received such as child support or social security.
	√	The employment changes substantially from the terms of hire, such as a change in work hours, work shift, job duties, or decrease in pay rate.
√		The participant needs to stay in the home because of illness of another family member. You may request medical documentation of the illness.
√		The participant is ill. If a participant is ill more than three consecutive days or habitually ill, you may request medical documentation of the illness.
√		The participant has a family emergency, using the reasonable standards of an employer.
√		The participant is absent or late due to bad weather, using the reasonable standards of an employer.

PJ	Work	Circumstance
√		The participant is absent or late because the participant or the participant's spouse has a job interview. The participant must provide notice 24 hours before the interview, if possible. The notice must include the name and address of the prospective employer. If 24-hour advance notice is not possible, the participant must provide the information as soon as possible. It must be provided before the interview.
√		<p>The participant has a newborn child. Absence is determined using the standards of the Family Leave Act of 1993, Section 102(a)(1) and (6)(1) and incorporated into the FIA. Maximum time available:</p> <ul style="list-style-type: none"> ▪ One parent: total of 12 work weeks of leave during any 12-month period. ▪ Two parents: aggregate of 12 work weeks of leave in case where both are entitled to leave, as PROMISE JOBS is considered to represent <i>the same employer</i>. <p>Participant may use less time if they wish.</p>

Barriers to Participation

Legal reference: 441 IAC 93.4(5)

Policy: Problems of a permanent or long-term nature are barriers to participation. They may be identified during assessment or during participation in the FIA.

When a participant reveals a new barrier to participation after an LBP is imposed and it is reasonable that the problem or barrier contributed to the failure that resulted in the LBP, the LBP must be stopped and considered in error.

Procedure: If barriers are identified during assessment, consider these issues in the development of the FIA. If they become apparent after participation has begun, the FIA may be renegotiated to address the barriers. Even if barriers to participation exist, the participant remains FIA-responsible.

Identify and include in the FIA any situations that stand in the way of self-sufficiency. See [FIA Contents](#) and [Renegotiation and Amendment of the FIA](#) for information on including barriers to participation in the FIA.

Some examples of barriers are:

- Lack of transportation.
- Substance addiction.
- Physical or cognitive disability or mental illness.
- Sexual or domestic abuse history.
- Overwhelming family stress.
- Lack of needed child or adult care. (Do not require participation until care has been arranged. Where special needs care is needed and not available, the participant's FIA activity may have to be the provision of this care.)

When a participant reveals a new barrier to participation after an LBP is imposed and it is reasonable that the problem or barrier contributed to the failure that resulted in the LBP, the LBP must be stopped and considered in error. See [Stopping an LBP](#) for more information.

If a person chooses not to cooperate in removing identified barriers to participation, the person is choosing the LBP, unless the person is refusing to apply for or to accept Social Security or SSI benefits. Refusing to apply for or to accept SSD or SSI cancels FIP eligibility for the entire FIP household.

Inform the participant's IM worker when a person in the FIP eligible group or a parent in the home provides medical evidence of a disability that is expected to last for more than 12 consecutive months or is expected to result in death. The IM worker will require the person to apply for and to accept SSD or SSI as a condition of FIP eligibility. For more information, see [Reporting Disability Information to IM](#).

Limited Benefit Plan (LBP)

Legal reference: 441 IAC 41.24(8)

Policy: A FIP participant is subject to an LBP when:

- The participant chooses not to follow the terms of the FIA; or
- The participant's referral status changes from exempt to FIA-responsible and the participant chooses not to write and sign an FIA.

A FIP applicant's failure to sign an FIA results in denial of FIP and does not result in imposition of an LBP. See [Referring Applicants](#) for more information. The normal LBP applies when the LBP is chosen by:

- The parent on a one-parent case.
- Either parent on a two-parent case.

The normal **first LBP**:

- Results in ineligibility for the entire family, and
- Continues until the person who chose the LBP reconsiders by signing an FIA.

A normal **subsequent LBP**:

- Results in ineligibility for the entire family for a minimum of six-months, and
- Continues indefinitely after the six months until the person who chose the LBP:
 - Reconsiders by signing an FIA, and
 - Completes 20 hours of work or other approvable PROMISE JOBS activity within 30 days after signing the FIA.

Any valid LBP counts when determining whether a household is subject to a subsequent LBP.

An LBP is not “valid” when the LBP was stopped because:

- The LBP was imposed in error, or
- The person who chose it was referred to PROMISE JOBS in error.

An LBP that is stopped because the person who chose it reconsidered and signed an FIA counts as a valid LBP, even if the person reconsiders before the effective date of the LBP and as a result there is no loss of FIP benefits.

The LBP is modified for other case situations. (See [Limited Benefit Plan Variations](#).)

NOTE: People who become ineligible for FIP due to the imposition of an LBP may remain eligible for SNAP and Medicaid.

Procedure: Use PJCase to:

- Determine if an LBP exists, the type of LBP and who is included in the LBP.
- Start an LBP when chosen by a parent.
- Stop an LBP when the FIA-responsible person reconsiders the LBP or you determine the LBP was imposed in error.

Examples of a normal first LBP:

1. Ms. D chooses a first normal LBP and her family's FIP is canceled effective September 1. The household will remain ineligible until Ms. D signs another FIA. In October, Ms. D reapplies. As long as other eligibility factors are met, FIP can be approved once Ms. D signs an FIA.
2. Ms. E chooses a first normal LBP and her family's FIP is canceled effective June 1. In December, her income goes down, and she reapplies for FIP. Ms. E must sign an FIA and meet other FIP eligibility criteria before FIP can be approved.

Example of a normal subsequent LBP:

Mr. F chose a first LBP two years ago. Mr. F chooses a subsequent LBP, and his family's FIP is canceled effective December 1. The entire family remains ineligible for the months of December through May. After May 31, ineligibility continues indefinitely until Mr. F signs an FIA and completes 20 hours of work or other PROMISE JOBS activity.

The following sections give more information on:

- [Choices resulting in a limited benefit plan](#)
- [Attempting to resolve participation issues](#)
- [Variations on the limited benefit plan in certain case situations](#)
- [The effect of changes in a household during a limited benefit plan](#)
- [Reconsidering an active limited benefit plan](#)
- [Stopping a limited benefit plan](#)

Choices Resulting in an LBP

Legal reference: 441 IAC 41.24(8), 93.13(239B)

Policy: An FIA-responsible FIP participant chooses an LBP when the participant does not carry out FIA responsibilities after signing an FIA.

A FIP participant whose referral status changes from exempt to FIA-responsible also chooses an LBP when the participant:

- Does not schedule or does not keep an FIA appointment.
- Does not sign the FIA during the appointment.

NOTE: An LBP does not apply when a FIP “applicant” fails to sign an FIA. FIP applicants must sign an FIA before FIP approval. Families that have received FIP for 60 months and are requesting a hardship exemption must sign a six-month FIA to be granted the exemption. Failure to develop or sign an FIA in these circumstances results in **denial of** FIP. See Referring Applicants and **HARDSHIP EXEMPTION** for additional information.

Procedure: When circumstances indicate that a person is choosing an LBP, make efforts to initiate participation and to resolve the FIA participation issue. For more information, see [Attempting to Resolve Participation Issues](#).

When the participant does not resolve the participation issue and you decide that the participant has chosen the LBP in one of these circumstances, refer the case for a review. See [Review of LBP Recommendation](#).

LBP provisions also apply when the “adults” in families approved for a hardship exemption fail to carry out the terms of their six-month hardship exemption FIA or fail to amend their hardship exemption FIA when so required. For more information, see [Hardship Exemption](#).

When a review of the case concurs that the participant chose the LBP, make entry in PJCase to start the LBP. As a result of your entry, the ABC system:

- Cancels FIP assistance for the people who are ineligible due to the LBP,
- Recalculates SNAP, and
- Sends a timely *Notice of Decision*, form 470-0485, to the household.
- Assigns the individual FIP status of “I” to the persons in the LBP.
- Sends an email to the IM worker.

The *Notice of Decision* explains the actions the person who chose the LBP needs to take to end the LBP. For a **subsequent** LBP, the notice also states the minimum six-month period of ineligibility.

The following section explains the LBP impact on other household members.

To Whom the LBP Is Applied

Legal reference: 441 IAC 41.24(8)

Policy: The conditions of the LBP apply to all persons in the FIP household except as indicated in the section [LBP Variations](#).

Children and parents who join the household of a parent who chose an active LBP are subject to the conditions of the LBP.

Children and parents who leave the household of a parent who has chosen an LBP are no longer subject to the conditions of the LBP unless the parent in the new household has chosen an LBP.

If a parent on a parental FIP case subject to an LBP applies for a separate nonparental caretaker case, the LBP does not apply to the children on the nonparental caretaker case.

Procedure: When a child or a parent joins the household of a parent who chose an active LBP, the IM will use the PJCase system to:

- Add the child or parent to the other parent's LBP, or,
- Reactivate the LBP for the child or parent if the child or parent is included in the LBP but the LBP is stopped for the parent or child due to leaving the home of the parent who chose.

IM will issue FIP benefits for the new members when eligibility exists in any month before the effective date of the LBP.

IM will use PJCase to stop the LBP for a child or parent who no longer lives with the parent who chose the LBP.

See [Two-Parent Households](#) for more information on applying an LBP in a household with more than one parent.

1. Ms. A chooses a first LBP. On June 2, the system sends a Notice of Decision to explain that FIP will end July 1 for Ms. A and her children. On June 7, Ms. A reports her 12-year-old son has moved into the home. The IM worker uses PJCase to add him to Ms. A's LBP.

On June 20, the worker determines the son meets all eligibility requirements and adds him to FIP effective June 14. The system issues an adjustive FIP payment for his June needs, cancels him for July 1 due to Ms. A's LBP, and sends one Notice of Decision to explain the action.
2. Ms. B chooses a subsequent LBP and is in the six-month period of ineligibility when her nephew moves into the home. She applies for a nonparental caretaker case for his needs only. He meets all eligibility requirements and is approved with Ms. B as payee. Her LBP does not affect her nephew's assistance.

3. Ms. C chooses an LBP for herself and her son. During the period of ineligibility, her son leaves her home and moves in with his grandparents. The grandparents apply for FIP assistance for the child. The IM worker uses PJCase to stop Ms. C's LBP for the child. The worker determines eligibility and approves FIP for the child.

Attempting to Resolve Participation Issues

Legal reference: 441 IAC 41.24(8), 93.13(239B)

Policy: PROMISE JOBS must make efforts to resolve an FIA participation issue when circumstances indicate that an FIA-responsible person is choosing an LBP.

Procedure: When circumstances indicate that a person is choosing an LBP, make efforts to initiate participation and to resolve FIA participation issues. To determine the actions that you must take, consider:

- If the person has attended orientation, and
- If the person has signed an FIA.

When a FaDSS participant appears not to be fulfilling FIA obligations, notify FaDSS and discuss your concerns at the time you send the clear written reminder. FaDSS may be able to help resolve the issue.

The next sections give more information on the circumstances under which a person chooses an LBP and the actions that you must take to initiate participation and to resolve FIA participation issues. These sections also refer you to other manual references that give more detailed instruction.

When you have determined that a person has chosen an LBP after you have taken all necessary actions to initiate participation and to resolve participation issues, refer the case for review as described at [Review of Limited Benefit Plan Recommendation](#).

Person Does Not Attend Orientation or Does Not Sign FIA

Legal reference: 441 IAC 41.24(8); 93.3(3)

Policy: FIP participants whose referral status changes from exempt to FIA-responsible are referred to PROMISE JOBS. They must contact PROMISE JOBS to schedule an appointment for orientation and the writing and signing of an FIA within 10 calendar days of the date that a PROMISE JOBS program letter is sent to notify the person that FIA responsibility has begun.

Procedure: When the IM worker makes entry to refer the FIA-responsible person, the ABC system automatically issues *FIA Referral for Mandatory Participants*, form 470-3105 instructing the participant to contact PROMISE JOBS to schedule an appointment within ten days to begin the FIA process. See [Referring Participants](#) for more information.

If the participant schedules and appears for the FIA appointment, provide “orientation” for the participant, which is an overview of the PROMISE JOBS program. After the participant receives orientation, assess the participant’s circumstances and work with the participant to negotiate and sign the FIA. A participant who does not participate in this process or who does not sign an FIA chooses an LBP.

If the FIP participant does not schedule an appointment or fails to attend or reschedule the appointment within the ten days, send *Your PROMISE JOBS Reminder*, form 470-3103.

Your PROMISE JOBS Reminder informs the person of the potential consequences of their lack of action. The form explains how a first and subsequent LBP affects FIP benefits for the family. It also states that the person can discuss the situation with a supervisor if the person is experiencing problems that make keeping an appointment difficult.

Consider the person to have chosen an LBP if the person:

- Does not schedule an appointment within ten days of the mailing date of form 470-3103, or
- Schedules an appointment but does not keep the appointment, or
- Keeps the scheduled appointment but does not sign an FIA.

See [Referring Participants](#) and [Service Upon Referral](#) for more information.

NOTE: Since there are not many instances where a FIP recipient’s referral status changes from exempt to FIA-responsible, the situation where an LBP is chosen before writing an FIA will be infrequent, such as:

- A child aged 16 or older who is not a parent who stops attending elementary or secondary school or the equivalent level of vocational or technical school on a full-time basis.
- A child who becomes a parent.

Comment:

Ms. A, her 16-year-old son, and her 10-year-old daughter apply for FIP. Ms. A is referred to PROMISE JOBS and an FIA is written and signed before their approval for FIP. Then the 16-year-old drops out of high school.

The IM worker changes his PROMISE JOBS referral status from exempt to FIA-responsible participant. The ABC system sends a letter instructing the son to contact PROMISE JOBS within 10 days to schedule his orientation and FIA appointment. He fails to do so. PROMISE JOBS sends a reminder letter giving him a second 10 days to respond. He fails to do so.

Person Signs FIA and Abandons the FIA Responsibilities

Legal reference: 441 IAC 41.24(8); 93.13(239B)

Policy: When an FIA responsible participant has signed an FIA fails to follow the terms of the FIA, PROMISE JOBS needs to attempt to resolve the participation issue.

Procedure: When an FIA responsible participant has signed an FIA fails to follow the terms of the FIA, attempt to resolve the participation issue. Make every effort to:

- Negotiate for a solution.
- Clarify expectations.
- Identify barriers to participation that should be addressed in the FIA.

A person's signature on an FIA is a written commitment to the activities outlined in the FIA, and an acceptance of the PROMISE JOBS services available for those activities.

FIP participants who choose an LBP after signing an FIA are no longer eligible for the PROMISE JOBS services outlined in the FIA, as well as FIP benefits. For this reason, make strong efforts to ensure that participants:

- Understand the expectations.
- Have not mistakenly or lightly chosen the LBP.
- Understand the seriousness of the choice of the LBP.
- Understand the FIA can be renegotiated and amended when family circumstances warrant it.
- Understand that they may involve the PROMISE JOBS supervisor at any time to discuss problems or questions.

Follow the policies under [FIA Participation Issues](#) regarding participation issues, problems with participation, and barriers to participation to determine if a person is choosing an LBP.

To attempt to resolve the participation issue, use written reminders, requests, and letters. Use communication as personal as possible and as detailed as needed to be sure the participant understands which action or inaction is indicating choice of the LBP and the actions needed to resolve the issue. Include an explanation of the LBP in your correspondence.

See [Reconsidering an Active LBP](#) for more information on the actions needed to end an LBP. See [14-O, PJCase System](#) for information on entries to start an LBP.

Review of Limited Benefit Plan Recommendation

Legal reference: 441 IAC 93.13(3)

Policy: When a participant appears to be choosing an LBP after PROMISE JOBS as make every effort to resolve the participation issue, the case needs to be referred for an administrative or local review of the circumstances. The review must concur that the participant has chosen an LBP.

Procedure: When a participant appears to be choosing an LBP after PROMISE JOBS as make every effort to resolve the participation issue, refer the participant for an administrative or local review. IWD administration staff determine the review procedures that occur before imposing an LBP.

The review process is not intended to discourage you from imposing an LBP. The purpose of the review process is to:

- Protect participants by providing an opportunity for another person to review the circumstances to ascertain that there is no further action PROMISE JOBS can take to encourage participation.
- Monitor the kinds of circumstances under which participants choose an LBP.
- Ensure that policy is being used equitably throughout the state in a reasonable and prudent manner.

When the written response agrees with your determination that the participant has chosen the LBP, make the system entries that will establish the LBP and initiate the *Notice of Decision*.

Comment:

1. Ms. A's 16-year-old drops out of high school, so IM changes his PROMISE JOBS referral status from exempt to an FIA-responsible participant. On May 15, the ABC system sends a letter instructing the son to contact PROMISE JOBS within ten days to schedule his orientation and FIA appointment.

He fails to do so. PROMISE JOBS sends a reminder letter giving him a second ten days to respond. He fails to do so. A review of the case concurs that the 16-year-old has chosen an LBP.

PROMISE JOBS makes an entry to impose the LBP. The system sends a *Notice of Decision* notifying Ms. A that her son has chosen a **first** LBP effective July 1. He will be ineligible for FIP until he reconsiders and signs an FIA. Ms. A and her other child remain eligible.

2. Mr. B and his child receive FIP. Mr. B has signed an FIA as an FIA-responsible PROMISE JOBS participant. The PROMISE JOBS worker determines that Mr. B is not following the steps of his FIA and attempts to resolve the issue by sending a written reminder letter.

After Mr. B does not respond to the written reminder letter, PROMISE JOBS determines that he has abandoned his FIA. Since Mr. B also chose an LBP in the previous year, PROMISE JOBS refers the case for an administrative review. The case review agrees that Mr. B has abandoned his FIA.

On June 7, local PROMISE JOBS receives approval and makes an entry to impose the **subsequent** LBP. The system cancels FIP and sends a *Notice of Decision* informing Mr. B that he has chosen a subsequent LBP effective July 1 and his six-month period ends December 1.

Once a subsequent LBP is chosen, the six-month ineligibility period remains unchanged, even if the case is canceled for other reasons.

Ms. D chooses a subsequent LBP that makes her family ineligible for FIP effective November 1 through April 30. The worker also cancels FIP effective November 1, as Ms. D's income exceeds FIP limits. In March, Ms. D's income goes down and she reapplies for FIP.

The worker denies the application because the six-month period of ineligibility is in effect through the month of April. Ms. D reapplies on June 2. She reconsiders the LBP by signing an FIA on June 10 and completing 20 hours of approvable PROMISE JOBS activity. The worker approves FIP effective June 10, the date the FIA was signed.

Limited Benefit Plan Variations

Legal reference: 441 IAC 41.24(8), 93.4(1)

Policy: The LBP is applied differently in certain households that include:

- [Children who are FIA-responsible PROMISE JOBS participants](#)
- [Both a minor parent and an adult parent](#)
- [Stepparents or needy relatives](#)
- [A needy specified relative who chose a limited benefit plan October 1, 2005, or earlier](#)
- [Two parents](#)
- [Families that are granted a hardship exemption](#)

Children Who Are FIA-Responsible

Legal reference: 441 IAC 41.24(8)“b,” 93.3(3)

Policy: A child who is **receiving FIP** and is **not exempt** must sign and follow the terms of the FIA. The child does not have a separate FIA, unless the child has children of their own or the child’s parents are exempt from participation. Require each FIA-responsible child in a household where the parent is exempt to sign an individual FIA.

An FIA-responsible child participant who fails to sign an FIA or fails to follow its terms while receiving FIP-chooses an LBP. The **individual** LBP makes the child ineligible. For a **first LBP** the child is not eligible for FIP until the child reconsiders the LBP by signing an FIA.

For a **subsequent** LBP, the child is ineligible for FIP for a minimum of six months and thereafter until the child reconsiders the LBP by signing an FIA and completing 20 hours of work or other approvable PROMISE JOBS activity.

If the FIA-responsible child who chooses the LBP is the **only child** in the home, the parent’s or needy relative’s FIP eligibility ends on the effective date the child’s LBP. This is because there is no longer any eligible child in the household.

Procedure: Use the PJCase to start an **individual** LBP when FIA-responsible child participant who fails to sign an FIA or fails to follow its terms while receiving FIP. The system will remove the needs of the child only.

Be aware that if the FIA-responsible child who chooses the LBP is the **only child** in the home, the parent’s or needy relative’s FIP eligibility ends on the effective date the child’s LBP. This is because there is no longer any eligible child in the household.

IM will cancel the FIP case effective the date the child's LBP begins.

Comment:

1. Ms. A and her 16-year-old son, who is not in school receive FIP. Each signed a joint FIA when they applied for FIP. If Ms. A chooses an LBP after signing the FIA, the normal LBP applies to the entire household.
2. Ms. A from Example 1 cooperates with the terms of the FIA, but her son chooses the LBP by not following terms of his FIA. The individual LBP makes the son ineligible effective March 1. The IM worker cancels FIP for Ms. A effective March 1 because there is no longer an eligible child in the home.
3. Ms. B receives FIP for her two daughters, a 16-year-old and a 17-year-old. Ms. B is exempt from PROMISE JOBS participation as she receives SSI. The 16-year old drops out of school and the worker refers her to PROMISE JOBS as an FIA-responsible participant because she is not enrolled in school. The 16-year-year-old fails to sign an FIA and chooses an individual LBP. The individual LBP makes the 16-year old ineligible. Ms. B will continue to receive FIP for the 17-year old, as long as they meet all other eligibility requirements.
4. Ms. C applies for FIP for her 16-year old son who is not in school. The worker refers Ms. C and the son to PROMISE JOBS to sign an FIA as a condition of receiving FIP. Ms. C signs an FIA but her son does not. The worker denies FIP for the entire family as the son is not eligible for failure to sign an FIA and Ms. C does not have an eligible child.

Minor Parents Living with FIP Parent or Needy Caretaker Relative

Legal reference: 441 IAC 41.24(8)"c," 93.4(239B)

Policy: A minor parent receiving FIP and living with their child must sign and follow the terms of an FIA. When a minor parent is living with a FIP parent or needy caretaker relative, each is responsible for a separate FIA. Both the minor parent and the FIP parent or needy specified relative must meet with PROMISE JOBS to write and sign an FIA before FIP approval.

If the adult parent chooses the LBP, the **normal** LBP applies to the entire eligible group.

If a needy specified relative who is not a parent chooses the LBP the **individual** LBP applies only to the relative.

EXCEPTION: The LBP applies to the entire eligible group when the LBP is effective October 1, 2005, or earlier. See [Stepparent or Needy Specified Relative](#) and [Needy Specified Relative Chooses Effective October 1, 2005, or Earlier](#) for more information.

When the minor parent chooses the LBP, the **partial** LBP applies only to the minor parent and any child of the minor parent.

For a **first** LBP, the minor parent and their child are not eligible until the minor parent reconsiders the LBP by signing an FIA.

For a **subsequent** LBP, the minor parent and their child are ineligible for a minimum of six months and thereafter until the minor parent reconsiders the LBP by signing an FIA and completing 20 hours of work or other approvable PROMISE JOBS activity.

Procedure: When FIP is canceled as the adult parent has chosen a **normal** LBP, the minor parent can reapply for FIP independently or as a minor parent living with self-supporting parents and then continue the FIA process. See [Stopping a Limited Benefit Plan](#) for more information.

Exempt the income and resources of the ineligible minor parent and any child of the minor parent in an LBP when determining continued FIP eligibility for the adult parent or specified relative and any children receiving FIP with the adult parent or relative.

When the minor parent is the only eligible child in the home and the minor parent chooses the LBP, the adult parent's or needy specified relative's FIP eligibility ends as of the LBP effective date. This is because the parent or needy specified relative no longer has an eligible child.

1. Mrs. A, her 17-year-old daughter, Ms. Z, and Ms. Z's child receive FIP. Both Mrs. A and Ms. Z are FIA-responsible and each signed their own FIA when they applied for FIP.

If Mrs. A chooses an LBP, the **normal** LBP makes the entire household ineligible, even though Ms. Z has signed her own FIA. Ms. Z has the option of applying for her own FIP case for herself and her child, as a minor parent living with a self-supporting parent.

2. Mrs. A from Example 1 cooperates in her FIA, but Ms. Z chooses a first LBP. A **partial** LBP is imposed effective June 1.

The LBP makes Ms. Z and her child ineligible. Although the LBP does not apply to Mrs. A, Ms. A is ineligible for FIP effective June 1 because she no longer has an eligible child. The IM worker cancels the entire case effective June 1.

3. Mrs. B applies for FIP for Ms. C, her 16-year old daughter and Ms. C's child. The worker refers Mrs. B and Ms. C to PROMISE JOBS to sign an FIA as a condition of receiving FIP. Mrs. B signs an FIA but Ms. C does not. The worker denies FIP for the entire family as Ms. C is not eligible for failure to sign an FIA and Mrs. B does not have an eligible child.

Stepparent or Needy Specified Relative

Legal reference: 441 IAC 41.24(8)"b," 93.4(239B)

Policy: A person included in the eligible group as one of the following is FIA-responsible unless exempt:

- An incapacitated stepparent.
- A needy specified relative.

If one of these persons chooses an LBP, the **individual** LBP applies only to the FIA-responsible person. The others in the FIP eligible group continue to receive FIP if other eligibility factors are met.

For a **first** LBP, the person **is not eligible** until the person reconsiders the LBP by signing an FIA.

For a **subsequent** LBP, the person **is not eligible for a minimum of six months**, and thereafter until the person signs an FIA and completes 20 hours of work or other approvable PROMISE JOBS activity.

Procedure: Use PJCase to make entry to start an **individual** LBP when an incapacitated stepparent or needy specified relative who is not a parent chooses an LBP.

EXCEPTION: An LBP chosen and effective October 1, 2005, or earlier applies to the entire eligible group when chosen by a needy specified relative who assumed the role of parent. See the [Needy Specified Relative Chooses Effective October 1, 2005, or Earlier](#) for procedures on this situation.

Examples:

1. The FIP household consists of Ms. B and her two grandchildren. Ms. B is included in the grant as a needy specified relative who has assumed the role of parent, since the children's parents are not in the home.

Ms. B is an FIA-responsible PROMISE JOBS participant and signed an FIA when she applied for FIP. Ms. B has chosen an LBP before. She chooses a subsequent LBP effective November 1, 2005.

Ms. B's needs are removed from the grant effective November 1. She is ineligible for FIP for a minimum six-month period. When the six-month period ends, Ms. B remains ineligible until she reconsiders by signing an FIA and completing 20 hours of PROMISE JOBS activity. The grandchildren remain eligible as long as other eligibility requirements are met.

2. The FIP household consists of Ms. A, her children, and her mother, Mrs. Z. Ms. A is disabled to the extent that she is unable to act as payee for her own case. Her mother is on the grant as a needy specified relative acting as payee when the parent is unable to do so.

Mrs. Z is an FIA-responsible participant and signed an FIA when she applied for FIP. She fails to follow the terms of her FIA and chooses a first **individual** LBP effective June 1, 2020. Mrs. Z's needs are removed from the grant effective June 1, 2020 and she remains ineligible until she reconsiders and signs an FIA.

The rest of the household remains eligible, as long as all other eligibility requirements are met.

Needy Caretaker Relative Chooses Effective October 1, 2005 Or Earlier

Legal reference: 441 IAC 41.24(8)"b," 93.4(239B)93.109(1)"b"

Policy: This section applies to a needy caretaker relative who is not a parent as there is no parent in the home and who chose an active LBP effective October 1, 2005, or earlier. See [Stepparent or Needy Specified Relative](#) for the effect of an LBP that is effective on or after November 1, 2005.

A **normal** LBP applies to the entire eligible group when it:

- Is chosen by a needy caretaker relative who is not a parent and
- Is effective October 1, 2005, or earlier.

If the needy caretaker relative who is not a parent has chosen a **first** LBP effective October 1, 2005, or earlier, FIP remains canceled until the relative either:

- Reconsiders the LBP by signing an FIA, or
- Reapplies for the needs of the children only.

If the needy caretaker relative who is not a parent has chosen a **subsequent** LBP effective October 1, 2005, or earlier, FIP remains canceled for a minimum of six months. FIP remains canceled until the needy specified relative either:

- Reconsiders the LBP by signing an FIA and completing 20 hours of PROMISE JOBS activity, or
- Reapplies for the needs of the children only.

Procedure: PROMISE JOBS made an entry to start a **normal** LBP under former policy for this situation.

See [Reconsidering an Active Limited Benefit Plan](#) for procedures to use if the relative reapplies as a needy caretaker relative.

IM uses the following procedures if the needy caretaker relative reapplies for the children only:

- When the LBP is a first LBP or is a subsequent LBP beyond the six-month period of ineligibility:
 - The IM worker temporarily stops the LBP by entering reason “W” in PJCase and determines FIP eligibility for the children. See [Stopping a Limited Benefit Plan](#) for more information.

If the LBP is not temporarily stopped while the relative receives FIP for the children, the FET system will incorrectly count the months of FIP towards the relative’s 60-month limit.

- If the needy caretaker relative later reapplies to be included in the eligible group, the relative must take the needed action to reconsider the LBP. The IM worker reactivates the LBP in PJCase, takes the steps to schedule an FIA appointment, and refers the relative to PROMISE JOBS.
- If the relative reconsiders the LBP, PROMISE JOBS stops the LBP by entering reason “R” in PJCase.
- If the relative fails to complete the reconsideration process, the IM worker denies the application to include the relative in the FIP household and stops the LBP again by entering reason “W” in PJCase.

- When the LBP is a subsequent LBP within the six-month period of ineligibility, IM will deny the application unless:
 - The application is filed in month six; and
 - There is an available FIA appointment after the six-month period and within the 30-day period for processing the application.

Two-Parent Households

Legal reference: 441 IAC 41.24(8)“b,” 93.4(239b)

Policy: All parents must sign and follow the terms of the FIA when in the home of a child receiving FIP unless exempt. When one parent is exempt, only the FIA-responsible parent must sign and follow the FIA.

Every FIA-responsible parent must meet with PROMISE JOBS to write and sign the FIA before FIP approval. Every FIA-responsible parent must follow the terms of the FIA or choose an LBP.

When the household consists of two parents and at least one common child on FIP, a **normal** LBP applies if either parent chooses. The entire household is ineligible for FIP in this situation.

If one parent chooses an LBP, the **normal** LBP applies even when the other parent is exempt. The other parent cannot end the LBP by participating.

For a **first normal** LBP when both parents are FIA-responsible PROMISE JOBS participants, ineligibility continues until both parents reconsider and sign an FIA. If one parent is exempt, only the FIA-responsible parent must sign an FIA to end the LBP.

A **subsequent** LBP applies when one parent chooses an LBP and either that parent OR the other parent in the home chose an LBP before that is no longer in effect.

For a **subsequent** LBP ineligibility continues for a minimum of six months and thereafter until both parents reconsider the LBP. To reconsider, each parent must sign an FIA and complete 20 hours of work or other approvable PROMISE JOBS activity. If one parent is exempt, only the FIA-responsible parent must complete the reconsideration actions to end the LBP.

A **partial** LBP applies in the following situations:

- The household consists of two parents but the only common child is not eligible for FIP, and one parent chooses an LBP.
- The household consists of a husband and wife who each have children but have no common children in the eligible group, and one parent chooses an LBP.

A **partial** LBP applies only to the parent who chose and that parent's children. Only the parent who chose needs to complete reconsideration actions to end a **partial** LBP.

Procedure: If the parents in an LBP separate and only one parent chose, the LBP continues for the parent who chose it and any children in the home of that parent. The IM will make entry in the PJCase system to stop the LBP for the parent and children who no longer live with the parent who chose.

When both parents chose an LBP and separate, each parent's LBP continues for the parent and any children in the home of that parent. The IM will make entry in PJCase to stop each parent's LBP record for the parent and children who no longer live with the parent who chose.

A subsequent LBP remains a subsequent when the parent that chose the current LBP has not chosen before and the parent that chose the prior LBP is no longer in the home. However, the subsequent LBP only applies to the parent that chose it and any children living with that parent.

When a parent enters the home of a child or co-parent on FIP, and the parent chose an active LBP the child and the other parent of the child become ineligible for FIP effective the first of the next month. The IM uses PJCase to either:

- Add the parent and child on FIP to the LBP of the parent joining the home when the parent and child were not previously on the LBP, or
- Reactivate the returning parent's LBP for the parent and child on FIP if the child or parent were previously active in the LBP but the LBP is stopped for the parent or child due to leaving the home of the parent who chose.

The IM's PJCase entries will cancel FIP for those impacted by the LBP.

Both parents must complete the required action to reconsider and end an LBP if both parents are in the home and FIA-responsible, even if only one parent chose the LBP. However, the other parent does not need to sign another FIA if the terms of the parent's existing FIA still apply. The parent on FIP may use participation in existing activities towards the hours required to end a subsequent LBP.

See [Reconsidering an Active Limited Benefit Plan](#) for more information.

Comment:

1. Mrs. A signs the FIA, but Mr. A does not sign. Deny the FIP application for the entire household.

If both Mr. and Mrs. A sign the FIA, but one of them later fails to carry out the terms of the FIA, an LBP is imposed. The normal LBP makes the entire family ineligible for FIP.

2. Same as Example 1, except that Mrs. A is exempt from PROMISE JOBS participation. Mr. A, the only FIA-responsible participant, signed an FIA as a FIP applicant. Mr. A fails to follow the terms of his FIA and chooses a first LBP beginning June 1. The normal LBP makes the entire family ineligible for FIP effective June 1. Ineligibility continues until Mr. A reconsiders by signing an FIA.
3. Same as Example 1, except that Mrs. A had chosen an LBP the previous year that ended before this application. Therefore, Mr. A's LBP is the second LBP chosen by a parent in this household.

The normal subsequent LBP makes the entire family ineligible for FIP effective June 1. The family remains ineligible for the months of June through November. After the six-month period ends, ineligibility continues until Mr. and Mrs. A each reconsider by signing an FIA and completing 20 hours of work or other approvable PROMISE JOBS activity.

4. Mr. F and Ms. G receive FIP for three children: his child, her child, and a common child. They have a joint family FIA. Mr. F abandons his FIA steps and chooses a first LBP effective December 1.

Although Ms. G is meeting the steps of her FIA, the normal LBP makes the entire family ineligible for FIP, including Ms. G's child, effective December 1. Ineligibility continues until Mr. F and Ms. G each reconsider by signing an FIA.

5. Mr. and Mrs. E receive FIP for his child and her child. They have a common child who receives SSI and therefore is not in the FIP eligible group. Mr. E is meeting the steps of their FIA. Mrs. E abandons her steps and chooses a first LBP beginning November 1.

The partial LBP makes Mrs. E and her child ineligible effective November 1. Ineligibility continues until Mrs. E reconsiders and signs another FIA. Mr. E and his child remain eligible, as long as all other eligibility requirements are met.

6. Mrs. B, her child, her husband Mr. B, and his child apply for FIP on one application. (There are no common children.) Both parents are FIA-responsible applicants mandatory PROMISE JOBS participants and must sign a joint FIA.

Mrs. B signs the FIA, but Mr. B refuses to sign. Deny the application for Mr. B and his child. If both parents sign the FIA, but Mr. B later chooses an LBP by abandoning his FIA steps, the partial LBP applies to Mr. B and his child.
7. Mr. and Mrs. C and their two children are ineligible for FIP, as Mr. C chose a normal first LBP effective August 1. On September 20, Mr. C and one child leave the home and Mrs. C applies for FIP.
8. Mr. and Mrs. D receive FIP for their three common children and signed a joint FIA when they applied. Mr. D chooses a normal first LBP effective June 1. Mrs. D was following her FIAv terms. The entire family is ineligible for FIP until both Mr. and Mrs. D reconsider the LBP by signing another FIA.

In August, Mrs. D reapplies for FIP for the children as Mr. D left the home. The IM worker makes entry in PJCase to stop Mr. D's LBP for Mrs. D and the children, refers Mrs. D to PROMISE JOBS, and schedules an FIA appointment. Mrs. D signs an FIA and FIP is approved.

In September, Mr. D returns to the home. The IM worker uses PJCase to reactivate Mr. D's LBP for Mrs. D and the children. As a result, FIP for Mrs. D and her children is canceled for FIP beginning October 1. If Mr. and Mrs. D want to reconsider the LBP, the IM worker refers Mr. D to PROMISE JOBS and schedules an FIA appointment for him. Mrs. D will not need to sign another FIA unless contacted by PROMISE JOBS because her existing terms no longer apply to her situation.
9. Mr. and Mrs. H receive FIP for their two common children, A and B, and signed a joint FIA when they applied. Both parents chose a normal first LBP effective October 1.

In January, Mrs. H reapplies for FIP for child B as Mr. H and child A left the home. Mrs. H wants to reconsider her LBP. The IM worker uses PJCase to stop Mr. H's LBP for Mrs. H and child B and to stop Mrs. H's LBP for Mr. H and child A. The worker refers Mrs. H to PROMISE JOBS as an FIA-responsible applicant and schedules an FIA appointment for Mrs. H.
10. Mr. and Mrs. G receive FIP for their two common children. Mr. G chose a first LBP 3 years ago and Mrs. G has never chosen an LBP. Mrs. G now chooses an LBP effective March 1 even though Mr. G is following his FIA. Mrs. G's LBP will be a subsequent since Mr. G is in the home and has chosen an LBP before. The family is ineligible for FIP until September 1.

On April 10, Mr. G leaves the home. Mrs. G's LBP remains a subsequent even though the parent that chose the prior LBP has left the home.

Families Granted a Hardship Exemption

Legal reference: 441 IAC 41.24(4), 41.24(8), 41.30(3)“e”

Policy: FIA-responsible members of families that have received FIP for 60 months and are requesting a hardship exemption must develop and sign a six-month FIA as a condition for being granted the exemption. Failure to develop or sign the special six-month FIA results in denial of the family’s hardship exemption request rather than an LBP.

FIA-responsible members of a family that has been granted a hardship exemption and that do not follow the terms of the six-month FIA or that fails to amend the FIA when necessary will have chosen an LBP.

Procedure: When an FIA-responsible member chooses a first LBP during the hardship exemption period and takes appropriate reconsideration action before the effective date of the FIP cancellation, FIP must be reinstated and the hardship exemption resumed for the remainder of the six-month period.

Family A’s six-month hardship exemption period is from July through December. Mr. A fails to follow the terms of his FIA, and a first LBP results. A *Notice of Decision* is sent canceling FIP effective August 1 because of the LBP.

If Mr. A signs another FIA before August 1, his FIP case is reinstated and may continue for the remainder of the six-month hardship exemption period.

If Mr. A does not reconsider the LBP before August 1, FIP remains canceled. A new application is required to regain FIP eligibility. If the family’s FIP eligibility continues to depend upon receiving a hardship exemption, the family must submit a new form 470-3826, *Request for FIP Beyond 60 Months*. A new hardship exemption determination is required before the FIP approval.

Families that choose a subsequent LBP during the hardship exemption period are ineligible for FIP for a minimum of six months, the same as in other FIP situations. They are not allowed to reconsider during the six-month period of ineligibility. FIP must be canceled for the remainder of the exemption period.

FIP eligibility cannot be regained until the LBP period of ineligibility has ended and the family meets all other requirements. A new application is required. Families whose FIP eligibility depends upon receiving a hardship exemption must also submit a new form 470-3826, *Request for FIP Beyond 60 Months*. A new hardship determination is required before FIP approval.

Family B's six-month exemption period is from July through December. Mrs. B fails to follow the terms of the FIA, and a subsequent LBP results. A *Notice of Decision* is sent canceling FIP effective August 1.

The family cannot regain FIP eligibility until the six-month LBP ineligibility period is over and the family meets all other requirements. A new application is required.

If the family's FIP eligibility continues to depend on receiving a hardship exemption, the family must also submit a new form 470-3826, *Request for FIP Beyond 60 Months*. A new hardship exemption determination is required before the FIP approval.

See [Limited Benefit Plan During a Hardship Exemption](#), for more information.

Changes in the Household During the Limited Benefit Plan

Legal reference: 441 IAC 41.24(8)

Policy: The conditions of the LBP apply to all members of the household except those indicated under [Limited Benefit Plan Variations](#).

New members who enter the household during the LBP period are also subject to the LBP.

If children in a case under an LBP chosen by a parent move to another household and meet all other eligibility factors, the children are eligible for FIP in the new household and no longer subject to the LBP.

If a parent on a parental FIP case subject to an LBP applies for a separate nonparental caretaker case, the LBP is not in effect for the children on the nonparental caretaker case.

Procedure: When new members enter the household after the LBP is imposed, IM will add the new member to the LBP in PJCase.

Examples:

1. Ms. A chooses a **first** LBP. The system sends a *Notice of Decision* to explain that FIP for Ms. A and her children is canceled effective July 1. On June 7, Ms. A's 15-year-old son moves into the home. The IM worker adds him to the LBP in PJCase. The LBP applies to him in the same manner as the other household members.
2. Ms. B chooses a **subsequent** LBP and is in the six-month period of ineligibility when her nephew moves into the home. She applies for a nonparental caretaker case for his needs only. He meets all eligibility requirements and is approved with Ms. B as payee. Her LBP does not affect her nephew's assistance.
3. Ms. C chooses an LBP for herself and her son. During the period of ineligibility, her son leaves her home and moves in with his grandparents. If all other eligibility factors are met, the grandparents can apply for and receive FIP assistance for the child.

Reconsidering an Active Limited Benefit Plan

Legal reference: 441 IAC 41.24(8), 93.16(1)

Policy: An LBP is considered imposed as of the date of the *Notice of Decision*.

A person who chooses a **first** limited benefit plan may begin the reconsideration process any time from the date of the *Notice of Decision* imposing the LBP. Once the *Notice of Decision* is issued to impose a subsequent LBP, the LBP cannot be reconsidered until the six-month period of ineligibility has expired.

When the six-month period of a **subsequent** LBP ends, the person who chose the LBP may reconsider by:

- Signing an FIA, and
- Completing 20 hours of work or other approvable PROMISE JOBS activity (other than work experience or unpaid community service).

Procedure: If the household files an application, IM will make entry to refer the person who chose the LBP to you no later than the date of the application interview. IM will explain the actions the person must take with PROMISE JOBS before the person and the person's family can receive FIP again.

If a household in a **subsequent** LBP files an application for FIP within the six-month period of ineligibility, IM will deny the application, unless:

- The household files the application in the last month of the period, and
- It is reasonable that the person who chose the limited benefit plan can sign an FIA within the 30-day time limit for processing the application.

Do not allow a person in a **subsequent** LBP to attend orientation or assessment activities or to sign an FIA during the six-month period of ineligibility. Begin counting the 20 hours of activity no earlier than the first day of the month after the six-month period ends. You may take steps to schedule the activity before the end of the six-month period, as long as the actual activity does not begin before then.

The following sections give more information on:

- [Signing the FIA.](#)
- [Required activities to end a subsequent LBP.](#)
- [Conclusions of the reconsideration process.](#)
- [FIP effective date following a LBP.](#)

Signing the FIA

Policy: The date the person signs the FIA is the date the IM worker will use to determine the effective date of FIP.

Procedure: When developing the FIA, follow the policy under [Family Investment Agreement](#), except as described in this section. Before you and the participant sign the FIA, make every effort to complete enough assessment to establish an ending date for the agreement with clear and specific goals and the steps that will be needed to reach self-sufficiency.

When additional assessment is needed, write the to include the additional assessment as action steps so that you can secure the person's signature and sign the FIA to establish the person's FIP eligibility date. For a **first** LBP, stop the LBP as described at [Conclusion of the Reconsideration Process](#).

If modifications are needed after further assessment, you and the participant must sign and date the modified FIA again. This applies in situations such as when FaDSS enrollment is appropriate for the person, and you need to involve the FaDSS specialist in the assessment of the individual.

See [Conclusion of the Reconsideration Process](#) for more information. When the household contains two parents, refer to [Two-Parent Households](#) for additional information. See the next section for additional participation requirements for persons wanting to end a **subsequent** limited benefit plan.

Required Activity to End a Subsequent Limited Benefit Plan

Policy: When the six-month ineligibility period of a **subsequent** LBP ends, and the person who chose the LBP wants to reconsider, the person must:

- Sign an FIA, and
- Complete 20 hours of work or other approvable PROMISE JOBS activity within 30 days from the date the FIA is signed.

Procedure: When a person contacts you to reconsider a subsequent LBP, refer the person to IM to reapply and begin the reconsideration process as described in the previous section.

When negotiating the FIA, determine the activity to be completed to end the LBP through discussion with the person wanting to reconsider. Consider the person and the individual family circumstances when arriving at the activity or component.

The person may choose work or any other PROMISE JOBS activity, other than the work experience or unpaid community service components. Applicants may use a combination of approvable activities to meet the 20-hour requirement.

NOTE: Due to the Fair Labor Standards Act, you cannot ask a person to participate in work experience or unpaid community service activities unless the person is receiving FIP benefits.

If your area has a FaDSS provider, the person may use FaDSS enrollment and participation to meet the 20-hour requirement when the person or family meets the characteristics served by the provider. Use FaDSS independently or in combination with other approvable activities, depending on the person's specific circumstances.

When the person has problems or barriers to participation, you may reduce or eliminate the 20-hour requirement, or extend the time for completion. This applies when problems or barriers occur or are revealed after the FIA is negotiated as well. See [Problems With Participation](#) and [Barriers to Participation](#) for more information.

In addition to the requirements described at [FIA Contents](#), the FIA must:

- Identify the activity the person agrees to participate in.
- Specify that the person must complete 20 hours of the activity to get FIP again, or specify fewer hours, when appropriate.
- State the specific date that the hours of activity must be completed by (the 30th day from the date the FIA is signed, unless you extend the date because of problems or barriers).

- Specify the supportive services that PROMISE JOBS will provide.
- Specify the documentation and reporting expectations for completion of the 20 hours of activity.

Issue payment for transportation, approve CCA, and issue payment for other allowable expenses:

- Needed to meet the 20-hour requirement, and
- Other policies allow issuance of the payment.

Regularly monitor and track the person's progress towards completion of the 20 hours of activity. When a person completes the 20 hours, stop the LBP by making entry into PJCase. This entry sends an E-mail to inform the IM worker that the worker can continue with determining FIP eligibility.

When the 30th day after the date the FIA is signed arrives, review progress, and determine if the person:

- Is making every effort to meet the requirement. Extend the time limit if the delay in completion is due to problems or barriers to participation and continue to work with the person.
- Abandoned the reconsideration attempt.

See the next section for the actions to take when a person either completes the activity, or abandons the reconsideration attempt.

Conclusion of the Reconsideration Process

Policy: The reconsideration process ends when you determine that the person who chose the LBP either:

- Completed the required reconsideration actions, or
- Abandoned the reconsideration attempt.

Procedure: When the household has a pending application, the IM worker will consider the application pending until notified by you that the reconsideration process has ended. This is true even if the time necessary to complete the reconsideration process extends beyond the normal 30-day application processing period.

Regardless of how the reconsideration process concludes, a *Notice of Decision* must be sent to the household. Entry into PJCase notifies the IM worker when you determine the reconsideration process has ended.

If the person **completes** the required reconsideration actions, make an entry in PJCase to stop the LBP. Processing of this entry:

- Removes LBP coding from ABC,
- Issues a *Notice of Decision* to inform the family that the LBP has ended, and
- Sends an E-mail to the IM worker.

When you have stopped the LBP, the IM worker will determine eligibility and issue another *Notice of Decision* to the family.

If you determine that the person has **abandoned** the reconsideration attempt, notify the IM worker through entry in PJCase. Processing of this entry:

- Removes the applicant JOBS code and pending reconsideration date from the systems.
- Sends an E-mail to the IM worker.
- Denies the application in ABC and sends a *Notice of Decision* to the family when the person is a FIP parent. Otherwise, the IM worker must make entry in ABC to deny the FIP application and to generate the notice.

Consider that the participant has abandoned the reconsideration attempt and contact the IM worker when:

- The person does not respond to your contact to begin the reconsideration process.
- You do not hear from the participant via telephone, in writing, or in-person contact.
- The person does not appear for an appointment and does not reschedule or contact you with a justifiable reason.
- A person in a subsequent LBP does not complete the 20 hours in the 30 days after the FIA is signed and does not contact you with a justifiable reason.
- A person in a subsequent LBP does not document completion of the 20 hours of activity in the 30 days after the FIA is signed and does not contact you with a justifiable reason.

FIP Effective Date Following a Limited Benefit Plan

Policy: The effective date of FIP eligibility following an LBP is the date the FIA is signed or the date the family or individual is otherwise eligible.

Procedure: When the family or individual is otherwise eligible, the IM worker will determine the effective date of eligibility following a **first** LBP as follows:

- If the FIA is signed before the effective date of the LBP, IM will reinstate FIP as of the effective date.

- If the FIA is signed on or after the effective date of the LBP, and FIP was canceled for the entire family, IM will approve FIP effective the date the FIA is signed, or seven days from the application date, whichever date is later.
- When adding a person excluded due to an LBP to an active FIP case, the effective date is seven days from the date the FIA is signed.

When a family is otherwise eligible following a **subsequent** LBP, the IM worker will approve FIP effective with the latest of the following dates:

- The date the FIA is signed, or
- Seven days from the application date.

NOTE: The effective date cannot be before the first day after the six month period of ineligibility ends.

When adding a person excluded due to a subsequent LBP to an active FIP case, the effective date is the later of:

- Seven days from the date the FIA is signed; or
- The first day after the six-month period of ineligibility expires.

Stopping a Limited Benefit Plan

Legal reference: 441 IAC 41.24(239B), 93.16(239B)

Policy: An LBP must be stopped when:

- The person who chose the LBP takes action to reconsider the LBP as described at [Reconsidering an Active LBP](#).
- The LBP was imposed in error.
- The person who chose the LBP was exempt and referred to PROMISE JOBS in error.
- A child leaves the home of the person who chose the LBP or turns 18 and is no longer part of that person's FIP household.
- The person who chose the LBP leaves the home.
- An appeal of imposition of an LBP is filed:
 - Before the effective date of the initial *Notice of Decision* establishing the beginning date of the LBP, or
 - Within 10 days from the date the appellant receives the notice establishing the beginning date of the LBP. The date on which the notice is received is considered to be five days after the date on the notice, unless the appellant shows that the appellant did not receive the notice within the five-day period.

An LBP is considered temporarily stopped pending issuance of a final appeal decision. The LBP will be considered imposed in error if the final decision reverses the decision to impose the LBP.

An LBP imposed in error is not considered a valid LBP when determining if a person previously chose an LBP.

Consider an LBP to be imposed due to PROMISE JOBS error when you find that proper policy or procedure was not followed in actions such as (but not limited to):

- Scheduling the person for a meeting or activity, when the person's failure to participate in the meeting or activity led to the imposition of the LBP.
- Requesting information, when the participant's failure to provide the information led to the imposition of the LBP.
- Notifying the person in writing of the participation issue that led to the imposition of the LBP.
- Attempting to resolve a participation issue, including failure to submit the case for a required review before making entry to start the LBP.

Also, consider an LBP to be imposed due to error when:

- You find that the person did not receive written correspondence about to the participation issue that led to the imposition of the LBP, as the correspondence was returned to you.
- The person provides verification that the person moved out of state or requested FIP cancellation before the date you decided that the person chose the LBP.
- The person who chose the LBP reveals a new problem or barrier after the LBP is imposed and it is reasonable that the problem or barrier contributed to the failure that resulted in the LBP.

Procedure: Stopping an LBP is the responsibility of either the IM worker or the PROMISE JOBS worker, depending upon the situation. You are responsible for stopping the LBP when:

- You discover you have imposed the LBP due to PROMISE JOBS error or the LBP is considered in error for the reasons stated above.
- The participant reconsiders, signs the FIA, and completes 20 hours of activity to end a subsequent LBP. (See [Reconsidering an Active Limited Benefit Plan](#) for actions required of you and the IM worker when you end an LBP because the FIA is signed.)

When you determine an LBP must be stopped due to any of these reasons, make entry in PJCase to stop the LBP:

- Use stop reason “R” to stop an LBP when the person who chose the LBP has taken the action to reconsider the LBP.
- Use stop reason “C” when you determine the LBP is in error due to any of the reasons previously stated.

After you make entry to stop an LBP, PJCase will send an email to notify the IM worker. See [14-O, PJCase System](#) for more information.

When a participant who has chosen an LBP reveals a new problem or barrier after an LBP is imposed, determine if it is reasonable that the claimed problem or barrier contributed to the failure that resulted in the LBP.

You may require the participant to provide supporting documentation of the claimed problem or barrier, such as documentation from a qualified medical or mental health professional or a statement from a third party with knowledge of the problem or barrier. Request any needed documentation in writing and allow the participant at least 10 calendar days to provide the documentation. Allow the participant additional time when needed.

To stop an LBP imposed due to error, make an entry in PJCase. Your entry causes the system to send a *Notice of Decision* to inform the household the LBP is ended and sends an e-mail to alert the IM worker to determine eligibility for corrective benefits.

The following chart is provided for PROMISE JOBS reference to summarize when the IM worker is responsible for stopping the LBP and taking appropriate action.

Situation:	IM worker action:
A timely appeal is filed.	Stop the LBP and issue a <i>Notice of Decision</i> by entering reason “A” in PJCase. Reinstate FIP. See Appealing a Limited Benefit Plan . If the final appeal decision affirms the Department’s action, reactivate the LBP in PJCase. See When the Final Decision Affirms the Limited Benefit Plan .

Situation:	IM worker action:
<p>A child in an LBP chosen by a parent leaves the household. Or, a child leaves the household of a needy specified relative who chose an LBP effective October 1, 2005, or earlier.</p> <p>Variations:</p> <ul style="list-style-type: none"> ▪ A minor parent and child leave the adult parent's or needy caretaker relative's home and become eligible on another case. ▪ A minor parent turns 18 (or completes high school if between the ages of 18 and 19) and applies for a separate case. ▪ A minor parent and child are canceled effective month one of the adult's LBP, and the minor parent applies for a separate FIP case as a minor parent living in the home of a self-supporting parent. 	<p>Stop the LBP for that child by entering reason "B" in PJCase. (The LBP remains in place for the parent or specified relative who chose it and any members of the eligible group who remain with that parent or specified relative.) See Changes in the Household During the Limited Benefit Plan.</p> <p>Stop the LBP for the minor parent and the minor parent's child by entering reason "B" in PJCase. See Minor Parents Living with FIP Parent or Needy Specified Relative.</p> <p>Stop the LBP for the minor parent and the minor parent's child by entering reason "B" in PJCase. (The minor parent is no longer considered a child, so the adult parent's or needy caretaker relative's LBP no longer applies.) See Minor Parents Living with FIP Parent or Needy Specified Relative.</p> <p>Stop the LBP for the minor parent and the minor parent's child by entering reason "B" in PJCase. See Minor Parents Living with FIP Parent or Needy Specified Relative.</p>

Situation:	IM worker action:
<p>The person was referred to PROMISE JOBS in error for one of the following reasons:</p> <ul style="list-style-type: none"> ▪ Exempt due to alien status. ▪ Exempt due to the receipt of SSI or school attendance at the time the <i>Notice of Decision</i> was issued imposing the LBP and the person timely reported and verified the receipt of SSI or change in school attendance status. ▪ Exempt due to the receipt of SSI or school attendance at the time the <i>Notice of Decision</i> was issued imposing the LBP but the person had not reported or had not verified the receipt of SSI or the change in school attendance. 	<p>See Who Is Exempt From PROMISE JOBS Participation.</p> <p>Stop the LBP and issue a <i>Notice of Decision</i> by entering reason “C” in PJCase. Redetermine eligibility.</p> <p>Stop the LBP and issue a <i>Notice of Decision</i> by entering reason “C” in PJCase. Redetermine eligibility.</p> <p>Stop the LBP and issue a <i>Notice of Decision</i> by entering reason “C” in PJCase. Redetermine eligibility. If the receipt of SSI or change in school attendance is not reported and verified until after the effective date of the LBP, do not issue corrective benefits.</p>

Situation:	IM worker action:
<p>The parent in a two-parent household who chose the LBP leaves the household, and the other parent did not choose the LBP.</p>	<p>Stop the LBP for the remaining parent and any children living with the parent and issue a <i>Notice of Decision</i> by entering reason “D” in PJCase. See Two-Parent Households.</p> <p>When the parent who chose the LBP leaves before the effective date of the LBP, reinstate FIP for the remaining household members, if otherwise eligible.</p> <p>When the parent who chose the LBP leaves on or after the effective date of the LBP, the remaining household members must reapply to receive FIP.</p> <p>The LBP remains on the parent who chose it and any children living with that parent. If the parent choosing the LBP rejoins the household and the LBP is still in effect, restart the LBP for the rest of the household using PJCase.</p>

Situation:	IM worker action:
<p>The LBP must be stopped but no other stop reason applies, such as:</p> <ul style="list-style-type: none"> ▪ The person who chose the LBP became exempt due to the receipt of SSI or school attendance after the <i>Notice of Decision</i> imposing it was issued and remains exempt. <p>NOTE: An FIA-responsible child remains FIA-responsible regardless of school attendance as long as the child remains eligible for FIP. If the child loses FIP eligibility and must reapply, the child is:</p> <ul style="list-style-type: none"> • Exempt if in school full-time or • FIA-responsible if not in school full-time. <ul style="list-style-type: none"> ▪ A needy caretaker relative chose an LBP effective October 1, 2005, or earlier and applies for the needs of the children only. 	<p>For a first LBP or a subsequent LBP that is beyond the 6-month period of ineligibility, stop the LBP by entering reason “W” in PJCase. Redetermine eligibility. Do not issue corrective benefits.</p> <p>Continue a subsequent LBP when the six-month period is in effect.</p> <p>For a first LBP, or a subsequent LBP that is beyond the six-month period of ineligibility, stop the LBP by entering reason “W” in PJCase. Determine eligibility for the children only.</p> <p>Consider the LBP as temporarily stopped. Reactivate it if the relative is needy and reapplies for the caretaker relative’s own needs.</p> <p>Do not stop the LBP for the children with reasons “B” or “D” unless they no longer live with the relative, because FET will not properly count the relative’s use of the 60-month limit.</p> <p>Continue a subsequent LBP when the six-month period is in effect.</p>

Situation:	IM worker action:
<ul style="list-style-type: none"> The LBP needs to remain active for the person who chose it, but does not apply to other persons included in the LBP, and neither reason “B” nor “D” apply. 	<p>Stop the LBP for the other person(s) by entering reason “I” in PJCase. Determine eligibility if needed. Situations for using reason “I”:</p> <ul style="list-style-type: none"> PJCase incorrectly includes a person who was not a child or parent in the FIP eligible group when the LBP was chosen. A household appeals FIP cancellation after being added to the LBP a person who entered the home after the plan is in effect for the person who chose it. In this situation, the LBP must remain active for the person who chose it and stopped for the recently canceled person.

Hardship Exemption

Legal reference: 441 IAC 41.30(3); 93.11(1)

Policy: The goal of FIP is for families to become self-sufficient within the 60-month lifetime limit required by federal law. However, recognizing that this goal is not attainable for all families, FIP assistance may be provided beyond 60 months to families in hardship conditions. This is called a “hardship exemption.” “Hardship” is defined as a circumstance that is preventing the family from being self-supporting.

A hardship exemption is not intended as an automatic extension of the 60-month limit, but is intended for families that are faced with barriers that are beyond their control and affect their ability to become self-sufficient. For families in this situation, the family’s safety takes precedence over the goal of self-sufficiency. Requests for a hardship exemption must be made on form 470-3826, *Request for FIP Beyond 60 Months*. The IM worker will issue this form as early as month 58 in a family’s 60-month lifetime FIP limit or upon the family’s request. Families no longer on FIP that have received FIP for 60 months must complete an application as a condition for regaining FIP eligibility.

Families may be denied or granted a hardship exemption. The hardship exemption eligibility determination is a two-step process:

- Based on supporting evidence, the local IM worker determines whether the family has a hardship condition that affects its ability to be self-supporting.
- For an FIA-responsible person, PROMISE JOBS determines how the hardship issues will be addressed in the FIA.

A family:

- Without an FIA-responsible person has to meet step 1.
- With an FIA-responsible person has to meet both steps before the hardship exemption request can be granted.

The family requesting the hardship exemption has primary responsibility for identifying hardship barriers and providing supporting documentation.

For a family with an FIA-responsible person, PROMISE JOBS, along with the family and recommendations from the family's service worker, will determine the focus of the steps to be included in the six-month FIA.

Federal regulations require that a hardship exemption must not begin until the adult in the family has received FIP for at least 60 months. A hardship exemption is limited to six consecutive calendar months.

Families may request and be granted more than one hardship exemption if warranted by their hardship circumstances, if they otherwise qualify for the exemption and meet FIP eligibility requirements. A new six-month FIA and a new hardship exemption determination are required for each subsequent hardship exemption period.

Each hardship exemption approval or denial must be disposed of with a corresponding *Notice of Decision*. Families whose request for a hardship exemption is denied are afforded normal appeal rights. In addition, the IM worker must record the family's particular hardship exemption approval or denial reasons in the FIP Eligibility Tracking (FET).

Families whose request for a hardship exemption is denied are afforded all the usual appeal rights. See [Hardship Appeals](#).

Parents are responsible for their family. Families that are approved for a hardship exemption must be willing to take steps to overcome their hardship. They must participate to their maximum potential in activities reasonably expected to result in self-sufficiency and demonstrate incremental progress toward that goal.

The LBP applies to FIA -responsible people who fail to follow the terms of their FIA during a six-month hardship exemption. If the family reconsiders the LBP, the family must submit a new form 470-3826, *Request for FIP Beyond 60 Months*, and gain approval to regain eligibility for FIP benefits.

See [Limited Benefit Plan During a Hardship Exemption](#) and [Limited Benefit Plan \(LBP\)](#) for more information.

Families may request and be granted more than one hardship exemption, if they otherwise qualify for the exemption and meet FIP eligibility requirements. A new six-month FIA and a new hardship exemption determination are required for each subsequent hardship exemption period.

Procedure: The IM worker must make the hardship exemption determination as soon as possible but no later than 30 days after the date a valid *Request for FIP Beyond 60 Months*, is received in any HHS or PROMISE JOBS office. When an application is required for the family to regain FIP eligibility, the 30 days begin the day after the application is received, if that date is later. (See [Final Exemption Decision](#).)

The following sections explain:

- [The requirements for qualifying for a hardship exemption](#)
- [Hardship exemption requests](#)
- [The process for determining whether the family has a hardship](#)
- [The appointment to develop and sign the six-month FIA](#)
- [The six-month FIA](#)
- [The process for the final hardship exemption decision](#)
- [The six-month hardship exemption period](#)
- [The Limited Benefit Plan provisions during the hardship exemption period](#)

Qualifying for a Hardship Exemption

Legal reference: 441 IAC 41.30(3)

Policy: A family that includes an adult who is subject to the 60-month FIP limit may receive FIP for more than 60 months if the family requests and is granted a hardship exemption as described in this manual and meet all other FIP eligibility requirements.

“Adult” means:

- The parent in the home with the child (even if the parent is or will be excluded from the FIP grant).
- The parent’s spouse in the home with the parent and child, whether or not the stepparent is included in the grant.
- A needy nonparental specified relative who is or requests to be on the FIP grant with the child.

A minor parent in the home who is payee for the minor’s own FIP case, even if the minor parent is excluded from the grant. When the only parent receives SSI (or both parents or both the parent and stepparent receive SSI), the 60-month limit does not apply. Therefore, a hardship exemption is not needed for the family to be FIP-eligible.

The 60-month limit does apply when both parents or the parent and stepparent are in the home but only one parent or stepparent receives SSI.

The 60-month limit does not apply when a specified relative receives FIP for a child but the relative is not included in the FIP grant. When the specified relative is needy and is included in the FIP grant, only the relative becomes ineligible at the end of the 60-month period. FIP for the child may continue.

Eligibility for a hardship exemption cannot begin until the adult in the family has received FIP for at least 60 months.

Families may be eligible for a hardship exemption when circumstances prevent them from being self-supporting. The purpose of the exemption is to allow families that have not been able to achieve self-sufficiency during their 60-month FIP period another opportunity to address the hardship barriers that have prevented them from becoming self-sufficient.

A hardship exemption is not a separate program, but is a special eligibility factor that, if met, allows families with hardship barriers to receive FIP beyond the 60-month limit. This means that, in addition to meeting hardship exemption criteria, families must meet all other FIP requirements to continue to receive FIP beyond the 60-month period.

In two-parent families, both parents must meet the hardship exemption requirements.

Families with FIA-responsible persons who are approved for a hardship exemption must be willing to take steps to overcome their hardship. They must participate to their maximum potential in activities reasonably expected to result in self-sufficiency and demonstrate incremental progress toward that goal. However, families' safety shall take precedence over the goal of self-sufficiency.

In two-parent families, both parents must meet the hardship exemption requirements.

Procedure: The hardship determination is a two-step process:

- Based on supporting evidence, the IM worker determines whether the family has a hardship condition that affects its ability to be self-supporting.
- If IM determines the family meets hardship criteria, the FIA-responsible adults in the family must meet with PROMISE JOBS to develop and sign a six-month FIA that addresses the family's hardship condition.

The family requesting the hardship exemption has primary responsibility for identifying hardship barriers and providing supporting documentation of the barriers and their impact on the family's ability to be self-supporting.

It is important that IM and PROMISE JOBS staff, when appropriate, help families to fully understand that their hardship condition does not excuse them from any financial or nonfinancial FIP requirements during the hardship exemption period.

The purpose of the hardship exemption is to involve the family with an FIA-responsible person in activities that can reasonably be expected to lead to self-sufficiency, rather than to use the hardship as a reason for excusing the family from program requirements.

The following sections address:

- [Qualifying hardship conditions](#)
- [Supporting evidence requirements](#)

Hardship Conditions

Policy: “Hardship” is defined as a circumstance that is preventing the family from being self-supporting. The family’s safety takes precedence over the goal of self-sufficiency.

The family requesting the hardship exemption has primary responsibility for identifying hardship barriers.

The hardship condition may be the result of a past or current experience that is affecting the family’s current functioning. “Current experience” may include fear of an event that is likely to occur in the future.

The hardship exemption applicant is a victim of domestic violence. The victim claims to be unable to look for work for fear of being harmed by the abuser.

If the abuser is in prison, this would not be considered a reasonable fear, unless the survivor suffers from mental or emotional health problems that affect the person’s ability to be self-supporting.

However, if the abuser is in the community and likely to harass or harm the survivor or their family, the fear is reasonable and a hardship exemption may be considered.

The definition of “hardship” emphasizes the impact of the hardship circumstance on the family’s ability to become self-supporting. Circumstances that may lead to a hardship exemption include, but are not limited to, the following:

- **Domestic violence.** Domestic violence may include:
 - Physical acts that resulted in, or threatened to result in, physical injury.
 - Mental abuse (includes emotional abuse).
 - Neglect or deprivation of medical care.
 - Sexual abuse.
 - Threats of, or attempts at, physical or sexual abuse.
 - Sexual activity involving the child.
 - Being forced to engage in nonconsensual sexual acts or activities.
- **Lack of employability.** This includes situations when the adult is functioning at a level that prevents steady or gainful employment, lacks marketable skills, or lacks basic work habits needed to remain employed.
- **Lack of suitable child care.** To be considered “suitable,” the child care provider must be registered or licensed, or must meet the required criminal and child abuse record checks.
- **Physical or mental health issues.** For the purpose of the hardship exemption, a physical or mental health issue is a condition that affects the family’s ability to be self-supporting, but does not appear to be sufficiently serious or long term as to warrant application for Social Security Disability (SSD) or Supplemental Security Income (SSI) benefits.

The health issue may be the result of a past or current circumstance, and may be temporary, recurring, or chronic. “Mental health” also includes emotional health.

A medical professional must verify the health issue and prepare a professional treatment plan that addresses the health issue. NOTE: Normal pregnancy or childbirth does not, in itself, meet hardship exemption criteria.

- **Disability.** For the purpose of the hardship exemption policies, a disability is a condition that appears to be sufficiently serious or long term as to warrant application for SSD or SSI.

FIP applicants and participants are required to apply for and accept SSD or SSI benefits when:

- The person claims a physical or mental disability that is expected to continue at least 12 months or results in death, and
- The person claims to be unable to engage in substantial activity due to the disability.

Adults who claim disability must:

- Be determined by a physician to be unable to work, and
- Provide verification to substantiate their claim.

Receipt of SSD or SSI benefits based on disability or blindness is considered proof of disability. Remember, the 60-month limit **does not** apply when the only parent in the home, or both parents or both the parent and stepparent are SSI recipients.

- **Housing situations** that make it difficult or impossible to work. This may include situations when:
 - The family's belongings are destroyed in a fire or flood, interrupting or delaying the family's employment arrangement; or
 - Travel time from the family's home to the job exceeds one hour each way, including time needed to take the child to day care.

NOTE: Living in the home of another person in itself does not qualify for a hardship exemption unless the family's living arrangement affects its ability to become self-supporting.

- **Substance abuse issues.** A claim of substance abuse must be verified by a clinical assessment.
- **Having a child with special circumstances** that require the parent (or the needy specified relative requesting to be on the FIP grant) to be in the home to provide care or supervision. This may be:
 - A child with physical or mental health issues, or
 - A child that receives child protective, juvenile court, or juvenile justice services or other child welfare services.
- **Other circumstances** that prevent the family from being self-supporting. Families whose hardship is not specifically listed are not automatically excluded from consideration for a hardship exemption. Each family is unique and has different circumstances that may hinder its efforts to achieve self-sufficiency.
NOTE: Needing more time to complete an educational program does not, in itself, meet hardship exemption criteria.

Procedure: When IM determines that a hardship exists and refers the hardship applicant to PROMISE JOBS to write the six-month hardship FIA, consider the circumstances under which the hardship was approved when negotiating the FIA with the applicant. Some examples follow:

- If domestic violence is identified as a barrier, the family must be offered the "Family Violence Option" whenever this barrier is identified. Refer to [Family Violence Option](#) for additional information.

- For applicants with substance abuse, physical, or mental health issues, include the applicant's professional treatment plan in the FIA. Refer to [Mental Health, Substance Abuse, and Other Rehabilitative Treatment](#) for more information.
- When the child is involved with child welfare services, the parent or needy specified relative may be required to be in an activity other than work for the purpose of safety. The child's safety takes precedence over the goal for the family's self-sufficiency. It is important that the terms of the FIA not conflict with the family's child welfare plans.

Supporting Evidence

Policy: The family is responsible for identifying the hardship barrier and must provide supporting evidence of the hardship barrier and its impact on the family's ability to become self-supporting. The supporting evidence must identify the circumstance that creates the barrier rather than just the type of barrier.

The reason for barrier and its impact are identified in this example:

A parent claims hardship because of inability to maintain employment. Statements from previous employers indicate that the parent repeatedly failed to show up for work and was fired. Additional evidence from a domestic violence counselor reveals that the absences were caused by domestic violence that the parent did not want divulged to the employers rather than inappropriate work habits.

Examples of supporting evidence that IM will use to determine if a hardship exists include:

- Court, criminal, law enforcement, child protective services, social services, medical, psychological, or psychiatric records that indicate physical, mental, or emotional harm to the child, the parent, or a needy specified relative requesting to be on the FIP grant.
- Statements from a domestic violence counselor that indicate domestic violence issues. **NOTE:** Living in a domestic violence shelter in itself does not automatically qualify the family for a hardship exemption but is strong evidence.

For example:

Families A and B are both living at a domestic violence shelter. Parent A is still able to maintain employment. A hardship exemption based on domestic violence is not appropriate for family A. The domestic violence issue has interrupted Parent B's employment and keeps Parent B from participating in work-related or job-readiness activities. A hardship exemption may be granted for family B.

- Court, criminal, law enforcement, child protective services, social services, psychological, or psychiatric records or statements from a substance abuse counselor that substantiate substance abuse issues.
- Verification from the court system, probation officer, psychiatrist, psychologist, medical professional, protective or social services professional, etc. that the parent or needy specified relative is needed in the home to provide care or supervision of a child who has special physical, mental, or emotional needs.
- Proof of application or reapplication for disability benefits from the Social Security Administration. **NOTE:** Participation in vocational rehabilitation services is not considered proof of disability, but it indicates that a disability may exist.
- A written statement from the Child Care Resource and Referral Center that “suitable” child care as defined is not available in the area where the family lives or where the (potential) job is located.
- Statements from a medical professional that substantiate physical, or mental or emotional health issues of the adult. The statement must:
 - Identify the particular health issue or condition.
 - Specify that the person is unable participate in any work-related or work-readiness activities.
 - Include a date that the condition is expected to last and the date of a scheduled follow-up examination, if any.
- Media reports substantiating the family's belongings were destroyed in a fire or other natural disaster, or that the family was involved in an accident, resulting in interrupting or delaying the family's employment arrangement or plans.
- Written statements from people other than the family with knowledge of the hardship circumstance. Written statements from friends or relatives alone are not sufficient to grant a hardship exemption, but may support other evidence.

Procedure: For FIA-responsible hardship applicants, the IM worker may contact PROMISE JOBS for information about the participant's participation in PROMISE JOBS or other circumstances that will help IM to determine whether hardship criteria are met.

EXAMPLE:

If the family with an FIA-responsible person has failed to comply with PROMISE JOBS activities that were offered to overcome a barrier to self-sufficiency, that specific barrier is not considered as meeting hardship criteria.

If appropriate, IM will consult with the PROMISE JOBS worker whenever the PROMISE JOBS worker may have relevant information, such as when the family is currently active for FIP, has previously chosen an LBP or is applying for a subsequent hardship period.

The IM worker will also include information received from the family's service worker to substantiate a family's hardship claim.

Hardship Exemption Request

Legal reference: 441 IAC 41.30(3)"c"

Policy: Families with adults who are subject to the 60-month limit who have received or who are close to having received FIP for 60 months may request a hardship exemption. Families that have exhausted their 60-month FIP period may also file a hardship exemption request at any time.

Requests for the exemption must be made on form 470-3826, *Request for FIP Beyond 60 Months*. Families that are no longer on FIP will also need to complete the *Food and Financial Support Application*, form 470-0462 or 470-0462(S), as a condition for regaining FIP eligibility.

Form 470-3826 is also an authorization for release of information that allows IM, service, PROMISE JOBS, and FaDSS staff to share with each other information about the family that may be relevant to the hardship exemption determination. This includes substance abuse, mental health, and AIDS/HIV-related information.

The date of the hardship exemption request is the date a valid form 470-3826 or 470-3826(S), *Request for FIP Beyond 60 Months*, is received in any HHS or PROMISE JOBS office. The form shall be date-stamped upon receipt in either office to preserve the date of the request.

Procedure: The IM worker will provide form 470-3826, *Request for FIP Beyond 60 Months*, no later than at the time of the family's timely 60-month FIP cancellation and also upon the family's request.

If a form 470-3826 *Request for FIP Beyond 60 Months* is received in a PROMISE JOBS office, date-stamp the form upon receipt in either office to preserve the date of the request. Forward it to the local IM office within one working day.

The IM worker will cancel FIP when the family has received 60 months of FIP, even if the family has filed a valid form 470-3826 in the meantime. The 60-month cancellation notice informs the family that PROMISE JOBS services are canceled and that the family will get another notice about the status of its hardship exemption request. If the request is granted, the family's FIP case will be reopened as appropriate.

When a *Request for FIP Beyond 60 Months* is received, the IM worker will check the family's FIP and LBP status to determine whether the hardship request is appropriate.

If an application for FIP is needed, the IM worker will issue the application within one working day. The IM worker will enclose a written note explaining the reason the application is required and that the hardship exemption request will be denied if the family fails to return the application by the stated due date.

If the family returns the application as requested, IM will continue with the steps in making the hardship determination. If the family fails to return the application or the requested evidence by the due date the hardship exemption request will be denied.

Hardship Determination

Legal reference: 441 IAC 41.30(3)"d"

Procedure: Income Maintenance will proceed with the hardship determination if the exemption request appears appropriate for the family's FIP case circumstances, meaning the family:

- Has received FIP for at least 58 months,
- Has submitted a required FIP application, and
- Meets non-financial FIP eligibility criteria.

The family's barrier to self-sufficiency may be caused by one primary hardship or by a combination of hardships. (See [Hardship Conditions](#).) The IM worker will consider the impact of the total circumstances on the family's ability to be self-supporting in the hardship exemption determination.

The IM worker will contact the family in writing to request the family to provide supporting evidence of its hardship condition and its impact on the family's ability to become self-supporting. The family will be instructed in writing to provide the evidence within ten days from the request. If the family fails to provide the requested information by the due date, the hardship exemption request will be denied.

Failure to supply all necessary evidence or refusal by the family to authorize the Department to secure the evidence from pertinent third parties shall result in denial of the family's hardship exemption request.

The IM worker will also determine whether the family has an active service case. If so, the IM worker will forward a copy of form 470-3884, *Hardship Exemption: Service Information*, to the service worker and request the worker to complete it. The primary purpose of this form is to:

- Help ensure that any hardship FIA being developed does not conflict with a service case plan already in place, and
- Support the service plan to the extent possible, while simultaneously moving the family toward self-sufficiency.

The IM worker will also use the information provided on form 470-3884 as an additional source to substantiate the family's hardship claim.

When the family provides the supporting evidence as requested, and the information on form 470-3884 is provided by the family's service worker, the IM worker will determine whether the family has a hardship condition that affects its ability to be self-supporting.

If the family does **not** meet hardship criteria, the IM worker will deny the hardship exemption request.

If the family **meets** hardship criteria, the IM worker will within one working day:

- Refer the applicant to PROMISE JOBS as described at Referring Hardship Exemption Families;
- Schedule an appointment for those referred to attend a required interview with PROMISE JOBS to develop and sign a six-month FIA; and
- Forward a copy of each of the following to the local PROMISE JOBS office:
 - Form 470-3826, Request for FIP Beyond 60 Months.
 - Form 470-3884, Hardship Exemption: Service Information, if one exists
 - The supporting evidence.
 - Form 470-3876, Hardship Exemption Determination, with all items in Part A completed except Section 2.

The documents:

- Notify you that the IM worker has determined that the family has a hardship condition, and the family must now develop and sign a six-month FIA before the hardship exemption request can be granted.
- Provide you with information about the specific reasons for approval of the hardship so that the FIA can be written to address those specific barriers.

Appointment to Develop and Sign the Six-Month FIA

Legal reference: 441 IAC 41.30(3)“e”

Policy: The FIA-responsible adults in a family with a hardship condition must meet with PROMISE JOBS to develop and sign a six-month FIA before the hardship exemption request can be approved. The agreement must address the circumstances that are creating the family’s barrier to self-sufficiency. The IM worker schedules the FIA appointment for the FIA-responsible adults.

The FIA-responsible adults include all of the following unless exempt:

- The parent in the home with the child (even if the parent is or will be excluded from the FIP grant).
- The parent’s spouse in the home with the parent and child if the spouse is or will be included in the FIP grant.
- A needy nonparental specified relative who is or requests to be on the FIP grant with the child.
- A minor parent in the home who is payee for the minor’s own FIP case, even if the minor parent is excluded from the grant.

Procedure: The IM worker will schedule this appointment at the earliest possible date. IM notifies:

- PROMISE JOBS of the appointment through entry in the PJCase Calendar option.
- The FIA-responsible adults by issuing form 470-3897, *FIA Appointment* to them.

Notify the FaDSS case manager of the appointment as soon as possible if the family is enrolled in the FaDSS program.

When the “adult” is incompetent or incapacitated, someone acting responsibly on the adult’s behalf may attend the FIA appointment for the adult. In two-parent families, both parents must attend.

Continue the case file narrative by clearly indicating that the family has exhausted 60 months of FIP and a *Request for FIP Beyond 60 Months* has been received.

The family may be granted good cause for failing to attend a scheduled meeting for reasons beyond the person's control, such as illness, family emergencies, or other unforeseen circumstances. In that instance, the meeting must be rescheduled. See [Service Upon Referral](#).

Failure by the required adults to attend the meeting without good cause results in denial of the family's hardship exemption request.

Six-Month FIA

Legal reference: 441 IAC 41.30(3)"d" and "e"

Policy: The FIA-responsible adults in a family that is requesting a hardship exemption must develop and sign a six-month FIA as a condition for receiving FIP beyond their 60-month limit. Failure to develop and sign the FIA results in denial of the family's hardship exemption request.

A stepparent is not required to sign the six-month FIA unless the stepparent's needs will be included in the FIP grant and the stepparent is an FIA-responsible person.

Procedure: For applicants, provide orientation services as described at [Orientation for PROMISE JOBS and the FIA](#) prior to developing the FIA. Do not authorize PROMISE JOBS supportive payments. If appropriate, schedule an additional appointment for assessment or literacy level tests, and write this appointment as a step in the FIA.

For families who apply for a hardship exemption before they reach their 60-month FIP limit, authorize supportive payments when needed to participate in writing the six-month FIA if the appointment is held before they are canceled from FIP and they are otherwise eligible. Do not authorize expense allowances for appointments held after FIP cancellation.

Develop a six-month FIA with all FIA-responsible adults in the hardship applicant family. All "adults" as defined under [Appointment to Develop and Sign the Six-Month FIA](#) must sign the FIA, unless exempt.

NOTE: Families that are applying for a hardship exemption must meet all other FIP requirements. For example:

- Other members of the family may be required to participate in PROMISE JOBS and sign an FIA as a condition for receiving FIP, such as a minor parent who is a child on the adult's FIP case, or a 16-year-old who is not in school. See [Referring Applicants](#) for more information
- When the family applying for the exemption is reconsidering a subsequent LBP, the family must complete 20 hours of work or other approvable PROMISE JOBS activity within 30 days from the date the six-month FIA is signed. See [Reconsidering an Active Limited Benefit Plan](#) and [Referring Persons in a Limited Benefit Plan](#) for more information.

The FIA must:

- Address the circumstances that are creating the family's barrier to self-sufficiency.
- Contain specific steps that can reasonably be expected to enable the family to make incremental progress toward overcoming the barrier. (See [Hardship Conditions](#) for discussion of FIA steps that apply to specific barriers.)
- Identify:
 - The activities to be completed by the family,
 - The individuals responsible for completion of the activities,
 - The relevant time frames, and
 - The method for monitoring the progress toward the goals of the FIA.

When developing the FIA with the family, incorporate information provided by the family's service worker to:

- Help ensure that the agreement does not conflict with a service plan already in place.
- Support the service plan, to the extent possible and practicable, while simultaneously moving the family toward self-sufficiency.

If the family is involved in the FaDSS program, take into consideration the FaDSS activities. However, the HHS service plan takes precedence over the FaDSS plan.

The family is expected to participate to its maximum potential in activities expected to lead to self-sufficiency. Build on the strengths of the individual family. Consider previous FIAs, particularly those aspects that were at least partially successful.

Possible FIA activities related the hardship condition may include, but are not limited to:

Hardship Condition	Possible FIA Activities
Domestic violence	<ul style="list-style-type: none"> ▪ Referral to local domestic violence project ▪ Appointments for professional counseling sessions ▪ Appointments for legal activities ▪ Family Violence Option ▪ FaDSS enrollment
Lack of employability	<ul style="list-style-type: none"> ▪ Workforce Investment Opportunity Act (WIOA) activities ▪ Job readiness skills training activities ▪ Local basic educational programs (adult basic education) ▪ ESL classes ▪ Work experience ▪ Volunteer work, unpaid community service ▪ Application with Division of Vocational Rehabilitation Services (DVRS) ▪ Compliance with employment plan from DVRS
Lack of suitable child care	<ul style="list-style-type: none"> ▪ Referral to child care resource and referral agency ▪ Continue to work with local resource and referral until child care is obtained ▪ Search for child care provider for non-traditional hours ▪ Job search for job with different hours ▪ Referral to HHS Service Unit if problems with child's behavior ▪ Referral to local area education agency (AEA) for early childhood assistance ▪ Referral to Early Head Start and Head Start programs
Physical or mental health issues	<ul style="list-style-type: none"> ▪ Compliance with health professional's treatment plan

Hardship Condition	Possible FIA Activities
Disability	<ul style="list-style-type: none"> ▪ Application for Social Security Administration benefits ▪ Appealing Social Security Administration determination ▪ Application and assessment with Division of Vocational Rehabilitation Services (DVRs) ▪ Compliance with employment plan from DVRs ▪ Compliance with health professional treatment plan
Housing situations	<ul style="list-style-type: none"> ▪ Application for low-rent housing ▪ Applications to landlords or realtors ▪ Application to local Habitat for Humanity program
Substance abuse issues	<ul style="list-style-type: none"> ▪ Completion of professional substance abuse assessment ▪ Compliance with substance abuse treatment plan
Child with special circumstances	<ul style="list-style-type: none"> ▪ Appointments with court system, probation officers, parole officers ▪ Child welfare services ▪ Counseling appointments ▪ Compliance with health professional treatment plan ▪ Compliance with Individual Education Plan from the area education agency (AEA) and the child's school
Other circumstances	<ul style="list-style-type: none"> ▪ Relocation plan ▪ Application for family self-sufficiency grant ▪ FaDSS enrollment ▪ Local resources based on individual circumstances

Maintain all hardship exemption documentation in a separate section labeled “Hardship Exemption” on the left side of the PROMISE JOBS case record. Include the six-month FIA and all correspondence, notices, supportive payment documentation, etc. particular to each hardship request under this section.

For families that are approved for the hardship exemption, provide required supportive payments to make participation possible. See [Supportive Payments](#).

Amend the FIA for:

- Participants approved for a hardship exemption and who are having difficulty fulfilling the steps in their six-month FIA or experience changed circumstances.
- Amend the FIA for participants approved for a hardship exemption when their six-month hardship exemption period is revised, e.g., as a result of a final appeal decision. IM will notify the PROMISE JOBS worker of a revision to the original six-month hardship exemption period. Refer to [Changing the 60-Month FIP or Six-Month Hardship Exemption Period](#) for more information.

Confer with the HHS service worker, the IM worker, or the FaDSS worker associated with the family when needed.

There is no limit on the number of hardship exemptions a family may receive over time. A new hardship exemption determination is required for each subsequent request. Each hardship exemption requires a new six-month FIA.

Final Hardship Exemption Decision

Legal reference: 441 IAC 41.30(3)“d”(3)

Policy: The IM worker must be notified by PROMISE JOBS when the adults in a hardship applicant family have signed an FIA.

Procedure: Document in Part B of form 470-3876, *Hardship Exemption Determination*, whether the family has met the FIA requirement. Return a copy of form 470-3876 to the IM worker. If the family is reconsidering an LBP and FIP approval is contingent upon completion of 20 hours of work activity, note this in Part B.

Make entry in PJCase:

- To indicate if each of the FIA-responsible persons signed an FIA.
- When an FIA-responsible person has completed the required hours of work activity needed to end a subsequent LBP.

Upon receipt of a copy of form 470-3876 from PROMISE JOBS, the IM worker will complete Part C of the form to reflect the final determination of the family's hardship exemption request:

- If you document in Part B that the family failed to attend the interview or failed to sign the FIA, the family is not eligible for a hardship exemption. IM will document the final hardship exemption denial in Part C of the form and deny the hardship application.
- If Part B reflects that the family attended and signed the FIA, IM will determine FIP eligibility and document the final hardship exemption determination in Part C of the form.

The IM worker will forward a copy of the completed form 470-3876 to:

- PROMISE JOBS
- The service worker identified on form 470-3884

Upon receipt of the completed form 470-3876 showing approval for a hardship exemption, forward a signed copy of the FIA to:

- The FaDSS worker, if FaDSS is involved with the family,
- The service worker identified on form 470-3884, and

Six-Month Hardship Exemption Period

Policy: Eligibility for a hardship exemption cannot begin until an adult in the family has received FIP for at least 60 months.

Families that are approved for a hardship exemption must meet all financial and nonfinancial FIP requirements during the six-month period.

Eligibility for a hardship exemption lasts for six consecutive calendar months, even if the hardship condition is resolved before the end of the six-month period. It includes a month when no FIP payment is made due to the limit on FIP grants below ten dollars.

FIP received for a partial month of the six-month hardship exemption period counts as a full month. **NOTE:** The six-month hardship exemption stops when the family's FIP case is canceled for any reason **other than** hardship and an application is needed for the family to regain FIP eligibility.

There is no limit on the number of hardship exemptions a family may receive over time. The family must submit a form 470-3826, *Request for FIP Beyond 60 Months*, for the initial and each subsequent hardship exemption request. A new hardship exemption determination is required for each subsequent request.

When a parent joins a participant family that is in a hardship exemption period, the exemption continues if the family otherwise remains FIP-eligible. If eligible, the joining parent is added for the remainder of the exemption period, even if the joining parent has received FIP for 60 months. See [Service Upon Referral](#) for instructions.

When two parents are in hardship exemption period and then they separate, the remainder of the exemption period follows the parent who retains the current FIP case, if that parent's FIP eligibility continues to be dependent on the hardship exemption.

Procedure: The IM worker informs PROMISE JOBS about changes in household composition during the six-month hardship period. The six-month FIA may need to be amended.

EXAMPLE:

1. Family C is approved for a hardship exemption based on disability. The six-month period is from April through September. In July, Mr. C is released to return to work. Provided his earnings do not create financial ineligibility, the hardship exemption period continues through September as originally approved.

2. Family A's hardship exemption period is from January through June. On March 15, Mrs. A reports that the only eligible child has moved out. Mrs. A's FIP case is canceled effective April 1. A *Notice of Decision* is issued stating FIP is canceled because no eligible child is in the home.

NOTE: If Mrs. A reports that the child has returned to the home before April 1, the IM worker will reinstate FIP and continue the hardship exemption period through June.

3. Family B's hardship exemption period is from February through July. Ms. B fails to follow the terms of her six-month FIA and an LBP results. FIP is canceled effective April 1 because of the LBP. Because Ms. B previously chose a valid LBP, she will be ineligible for FIP for a minimum of six months.

NOTE: If this were Ms. B's first LBP, and she reconsidered by signing an FIA before the effective date of the FIP cancellation, FIP would be reinstated and the hardship exemption continued through July.

The family's 60-month FIP period ends March 31. In May, the family has an emergency. On May 12, the family submits the *Request for FIP Beyond 60 Months* and a FIP application. If the family is approved for a hardship exemption, the six-month period will be from May 19 through October 30. The FIA will cover the same period.

Mrs. B and her child receive FIP in a hardship exemption period. The six-month period will end June 30. On March 10, Mr. B, the child's father, joins the family. The hardship exemption continues if the family remains eligible for FIP regardless of whether Mr. B has received FIP for 60 months.

If Mr. B signs an FIA and is otherwise eligible, the IM worker will add him to the FIP eligible group and make a referral to PROMISE JOBS. IM will refer Mr. B to PROMISE JOBS as described at Referring Applicants.

Changing the 60-Month FIP or Six-Month Hardship Exemption Period

Policy: A six-month hardship exemption period cannot begin until the family has received FIP for the entire 60-month period. It may be necessary to change the 60-month FIP period and, as a result, change the six-month hardship exemption period.

Changes in a previously established 60-month FIP period may result when:

- A final appeal decision upholds the family and orders the Department to extend the 60-month period; or
- A coding error on the ABC system results in an inaccurate 60-month count.

When the additional months of the revised 60-month period extend into an existing six-month hardship period, the exemption period is extended by the same number of months. A new hardship determination is not needed.

If the additional months of the 60-month period go beyond the end of the current hardship period, the current hardship exemption period is void. Instead, these months become part of the family's revised 60-month period. FIP must be canceled at the end of the revised 60-month period. The family may reapply for a hardship exemption at the end of the 60-month FIP period.

Procedure: The IM worker will:

- Issue a *Notice of Decision* to inform the family of a revised 60-month FIP period or hardship exemption period.
- Notify PROMISE JOBS of the changes and the need for amending the family's current FIA to extend over the revised 60-month or six-month period.

Schedule an appointment with the participant to renegotiate the FIA. Even though the *Notice of Decision* informs the family to contact PROMISE JOBS to amend the FIA and that an LBP results from failing to do so, PROMISE JOBS needs to initiate the appointment. See [Renegotiation and Amendment of the FIA](#).

1. Family C's 60-month FIP period ends 12/31.
12/15 – The IM worker cancels FIP effective 1/1.
12/20 – The family appeals the FIP cancellation. FIP is reinstated for 1/1.
12/21 – The family files a hardship exemption request.
01/18 – The hardship exemption is approved from 1/1 through 6/30.
02/15 – The final appeal decision upholds the family and determines a 3/31 ending date of the family's 60-month period.

Since the appeal decision extended the 60-month ending date to March 31, the six-month hardship exemption period cannot start until April 1. Therefore, January, February, and March of the original hardship period become part of the revised 60-month FIP period.

The revised hardship period then is from April 1 through September 30. The family's FIA scheduled to end June 30 must be amended to extend through the revised September 30 hardship exemption ending date. The IM worker notifies PROMISE JOBS of the changes and the need for the family's FIA to be amended.

The IM worker issues a *Notice of Decision* to inform the family about the revised 60-month and six-month periods. The notice informs the family to amend the FIA and that an LBP results from failing to do so.

PROMISE JOBS schedules an appointment to amend the FIA.

2. Family D's 60-month FIP period ends March 31. The family requests and is approved for a six-month hardship exemption from April 1 through September 30. In May, the IM worker discovers an ABC coding error that resulted in two months erroneously being counted toward the family's 60-month period.

This means the family's 60-month period should have ended May 31. As a result, April and May become part of the revised 60-month FIP period. The revised hardship period is from June 1 through November 30.

The same steps as in Example 1 must be followed with respect to notifying the family and PROMISE JOBS of the revised 60-month and six-month periods and amending the FIA.

The hardship period is from January through June. In March, the IM worker discovers that the 60-month FIP period should extend through August 31. The IM worker makes necessary system changes to void the hardship exemption and sends a *Notice of Decision* to inform the family that the hardship exemption period is not needed.

The IM worker notifies PROMISE JOBS of the changes. PROMISE JOBS schedules an appointment to amend the FIA to extend through August 31. The family may reapply for a hardship exemption in the usual manner when the new 60-month period is over at the end of August.

Hardship Overpayments

Policy: All PROMISE JOBS supportive payments are subject to recovery when the FIA-responsible person is not eligible for the payment, including payments made during an erroneously approved hardship exemption period.

FIP/PROMISE JOBS supportive payments issued beyond the family's 60-month period are subject to recoupment unless the family requests and is approved for a hardship exemption period for any of these months.

If a hardship exemption is approved, consider months of FIP assistance beyond the 60-month limit toward the approved six-month hardship exemption period. No overpayment is due for any month that becomes part of the six-month hardship period.

Procedure: Recoup supportive payments issued during an erroneously approved hardship exemption period.

Also recoup supportive payments paid when FIP is issued beyond the family's 60-month limit due to:

- Reinstatement pending the outcome of an appeal (when the final appeal decision later upholds the Department).
- Worker error in properly coding months that are subject to the 60-month limit, preventing FET from counting those months.
- Required timely notice to cancel FIP at the end of the 60-month period.

Comment:

1. Family G's 60-month FIP period ends 12/31.
12/15 – The IM worker enters the FIP cancellation effective 1/1.
12/20 – The family appeals cancellation. FIP is reinstated for 1/1.
02/15 – The final appeal decision upholds the Department.

FIP is canceled effective March 1 in accordance with the final appeal decision. FIP and all supportive payments issued for January and February are subject to recoupment.
2. Family H's 60-month FIP period ends 12/31.
12/15 – The IM worker issues a notice and cancels FIP effective 1/1.
12/20 – The family appeals the cancellation. FIP is reinstated for 1/1.
01/26 – The family files a hardship exemption request.
02/12 – The hardship exemption is approved from 1/1 through 6/30.
02/15 – The final appeal decision upholds the Department.

During the period that FIP assistance continues pending the outcome of an appeal, the family is considered a "participant." FIP is canceled effective March 1 in accordance with the final appeal decision.

Since the appeal upheld the original December 31 FIP ending date, the six-month hardship exemption period is from January 1 through June 30. January and February become part of the family's six-month exemption period. No overpayment is due.

When a month of FIP assistance beyond the family's 60-month limit is subject to recoupment, the IM worker will identify that month in FET.

Limited Benefit Plan During a Hardship Exemption

Legal reference: 441 IAC 41.30(3)"e"(3)

Policy: As a condition for being granted a hardship exemption and before FIP can be approved, the family is required to develop and sign a six-month FIA. Failure to develop and sign this FIA results in denial of the family's hardship exemption request, rather than an LBP.

However, a family that has been granted a hardship exemption and does not follow the terms of its six-month FIA or that fails to amend the FIA when necessary has chosen an LBP.

When a family chooses a first LBP during the hardship exemption period and takes appropriate reconsideration action before the effective date of the FIP cancellation, FIP must be reinstated and the hardship exemption resumed for the remainder of the six-month period.

Families that choose a subsequent LBP during the hardship exemption period are ineligible for FIP for a minimum of six months. The same as in other FIP situations. They are not allowed to reconsider until the six-month period of ineligibility has ended. Therefore, FIP must be canceled for the remainder of the hardship exemption period.

FIP eligibility cannot be regained until the LBP period of ineligibility has ended and the family meets all other requirements. A new application is required. Families whose FIP eligibility depends upon receiving a hardship exemption must also submit a new form 470-3826, *Request for FIP Beyond 60 Months*. A new hardship determination is required before FIP approval.

Procedure: Monitor participant progress in the six-month FIA as you would with any other FIA. When participation become an issue, follow the procedures at [FIA Participation Issues](#) to attempt to resolve the LBP. Impose an LBP if the participant does not resolve the issue and resume participation after your attempts to resolve the issue.

EXAMPLES:

1. Family A's six-month hardship exemption period is from July through December. Mr. A fails to follow the terms of his FIA, and an LBP results. A *Notice of Decision* is sent canceling FIP effective August 1 because of the LBP.

This is Mr. A's first LBP. If Mr. A reconsiders by signing another FIA before August 1, his FIP case is reinstated and may continue for the remainder of the six-month hardship exemption period.

If Mr. A does not reconsider the LBP before August 1, FIP remains canceled. A new application is required to regain FIP eligibility. If the family's FIP eligibility continues to depend upon receiving a hardship exemption, the family must submit a new form 470-3826, *Request for FIP Beyond 60 Months*. A new hardship exemption determination is required before the FIP approval.

2. Family B's six-month exemption period is from July through December. Mrs. B fails to follow the terms of the FIA, and an LBP results. A *Notice of Decision* is sent canceling FIP effective August 1 because of the LBP.

This is Mrs. B's second LBP. The family cannot regain FIP eligibility until the six-month LBP ineligibility period is over and the adults complete the actions needed to end the LBP. A new application is required.

If the family's FIP eligibility continues to depend on receiving a hardship exemption, the family must also submit a new *Request for FIP Beyond 60 Months*. A new hardship exemption determination is required before the FIP approval.

Resolution of Disputes, Appeals, and Grievances

Policies on handling disputes, processing appeals and grievances are organized as follows:

- [Informal dispute resolution](#)
- [PROMISE JOBS appeal procedures](#)
- [Grievances on displacement issues](#)

Refer to [13-G](#) for appeals regarding the Child Care Assistance program.

Informal Dispute Resolution Process

Legal reference: 441 IAC 93.15(1)

Policy: When there is disagreement between the participant and the immediate PROMISE JOBS worker regarding an FIA or participation in PROMISE JOBS components, the participant can request to talk to the supervisor and request a decision on the dispute.

The supervisor shall schedule a face-to-face interview with the participant within 7 days and issue a decision in writing within 14 days of the participant's request.

Procedure: Issue the written decision in the form of a letter or memo written by the supervisor or designee. Do not use the *Notice of Decision: Services*. Make clear to the participant that this resolution process is not an appeal, nor are appeal rights extended while this process is being conducted. A participant can ask for the meeting with the supervisor before or after signing the FIA. See [PROMISE JOBS Appeal Procedures](#) for the relationship between the informal resolution process and the right to appeal the content of the FIA.

PROMISE JOBS Appeal Procedures

Legal reference: 441 IAC 7, 93.15(239B)

Policy: Each FIP applicant and participant has the right to a hearing about services being received or services that have been requested and denied, reduced, canceled, or inadequately provided.

Applicants and participants also have the right to appeal any acts of discrimination based on race, creed, color, sex, national origin, religion, age, physical or mental disability or political belief. The HHS Administrative Rules and Appeals unit sends a copy of any appeal regarding acts of discrimination to the HHS FFWS. At the same time, the liaison informs the participant of this, providing the telephone number and address of the Unit.

A PROMISE JOBS participant has the right to appeal any violation of PROMISE JOBS program policy imposed as a condition of participation. The PROMISE JOBS provider agency must provide written documentation to the participant that specifies the requirement in question.

A PROMISE JOBS participant has the right to appeal the content of the FIA if the disagreement between the participant and the PROMISE JOBS worker cannot be worked out through the informal resolution process. (See [Informal Dispute Resolution Process](#).)

Never take an action or omit an action that seems to interfere with the participant's right to appeal. See [Notice of Decision](#) for information on protecting participant appeal rights. For complete information on the HHS appeals process, see [1-E, Appeals and Hearings](#).

An appeal must be filed in writing.

Procedure: Persons wanting to file an appeal and request a hearing may file:

- Via the department's website,
- By telephone
- By mail
- In person or
- Through other commonly available electronic means (such as email or facsimile)

Encourage the appellant to make a written appeal on form 470-0487 or 470-0487(S), *Appeal and Request for Hearing*. Provide any instructions or assistance required in completing the form. However, use of this form is not required. If the appellant submits the written appeal on another paper to you, attach it to the appeal form.

The fact that an appellant is unwilling to complete or sign the appeal form does not preclude the right to file an appeal, as long as the appeal has been communicated to you as a representative of HHS by the appellant or appellant's representative.

When you receive a written appeal request, document the receipt date, including the date the appeal was orally requested, when applicable. Document the filing date by saving the envelope with the postmark and date stamping the date received at any Department office. Attach the envelope to the appeal form, scan all documents, and forward it electronically to the HHS Administrative Rules and Appeals Section within 24 hours of receipt. Email: appeals@hhs.iowa.gov.

When you receive a verbal request to appeal, document the conversation on form 470-0487 or 470-0487(S), *Appeal and Request for Hearing* and forward to the HHS Administrative Rules and Appeals Section within 24 hours. Complete the:

- Appellant's name, address, and phone number;
- Program or programs that are being appealed;
- Tell us why you are appealing. For the response to this question, the worker should enter, "Per telephone conversation with the appellant on (enter the date)," and the reason that the appellant is appealing; and
- Do you want your benefits to continue during your appeal;
- Do you want an informal conference with your worker;
- Do you want a language interpreter for your hearing;
- Worker information section.

When submitting an appeal request to the HHS Administrative Rules and Appeals Section:

- Include a copy of the FIA when the appellant is appealing the contents of the FIA.
- Include a copy of the contested notice of decision only when the appellant is appealing a CCA decision. HHS Administrative Rules and Appeals can get a copy of the *Notice of Decision* from WISE when the appeal is regarding an LBP or a supportive payment other than CCA.

Send the IM worker a copy of an LBP appeal request at the same time that you send it to the HHS Administrative Rules and Appeals Section.

Within ten days of filing the appeal, upload a written summary of the action being appealed to the HHS Appeals Information System (AIS).

When the appeal involves actions that affect PROMISE JOBS only, you are responsible for preparing the appeal summary and attending the hearing.

When the appeal involves an LBP, both the IM worker and the PROMISE JOBS worker each prepare an appeal summary. IM workers **do not** need to attend LBP hearings except in rare situations when PROMISE JOBS asks for IM's attendance as it will help the particular case.

The following sections explain how these procedures apply to:

- [Continuing benefits pending an appeal decision](#)
- [Appeals of limited benefit plans](#)
- [Appeals of hardship exemption decisions](#)
- [Appeals in the Work Experience Program](#)

Continuation of Benefits Pending Appeal Decision

Legal reference: 441 IAC 7.17(17A)

Policy: Assistance is continued if the appeal is filed before the effective date of the intended action or within 10 days from the date the notice is received. The date the notice is received is considered to be five days after the date on the notice unless the appellant shows the notice was not received within the five-day period.

Procedure: Continue PROMISE JOBS services, including supportive payments, when:

- The appeal is “timely,”
- The notice under appeal canceled, reduced, or suspended FIP or PROMISE JOBS benefits,
- The appellant requests that benefits continue, and
- The appellant continues to participate in the PROMISE JOBS activity.

A “timely” appeal is filed:

- Before the effective date of the notice or
- Within 10 days from the date the notice is received (15 days from the issuance of the notice or longer if the appellant shows the notice was not received within five days of issuance).
- When the last day before the effective date or the 10th day falls on a weekend or holiday, the appeal is timely if filed by the end of the next working day.

This situation is most likely to occur in classroom training, when you have terminated the training plan or imposed an LBP, but the participant files a timely appeal and continues to participate in the program. The key is that the participant continues to participate in the assigned activity.

Do **not** continue assistance when the appeal was not filed “timely,” or the appellant does not continue to participate in the activity.

Recoup PROMISE JOBS supportive payments issued for the months that the appeal was pending when the final appeal decision affirms the Department's decision to cancel, deny, or suspend benefits **except when**:

- The appeal issue was imposition of an LBP, and
- The appeal was a "timely" appeal of the notice issued to initially start the LBP and the LBP will be reactivated with a new effective date.

IM assumes the appellant wants FIP assistance to continue pending the appeal unless the appellant has stated in writing that they do not want FIP assistance to continue.

If an appellant files a timely appeal of the LBP and does not request that FIP not continue pending the appeal and otherwise remains eligible for a FIP:

- The IM worker will stop the LBP in PJCase and reinstate FIP until the final appeal decision is received.
- PJCase issues a notice telling the appellant that the LBP is delayed due to the appeal.
- Continue PROMISE JOBS services and issue supportive payments if the appellant continues to participate in the assigned PROMISE JOBS activity.

IM will not stop the LBP when:

- The appeal is not filed timely,
- The client is not eligible for continued benefits, or
- The client does not want benefits to continue.

Appealing a Limited Benefit Plan

Legal reference: 441 IAC 7, 93.15(239B)

Policy: A person has the right to appeal the establishment of a **first** or **subsequent LBP** when the *Notice of Decision* establishing the LBP is issued. A person can appeal the establishment of a particular LBP only once.

If another appeal is filed after the LBP appeal, a hearing may be granted only if the appeal involves worker error, such as an incorrect grant computation or an error in determining the eligible group.

Procedure: The HHS Administrative Rules and Appeals Section makes the determination as to whether a hearing will be granted. PROMISE JOBS does not make this determination.

If you receive an appeal request of an LBP, and the appellant filed a prior appeal regarding the same LBP, forward the appeal request to the HHS Administrative Rules and Appeals Section as described at [PROMISE JOBS Appeal Procedures](#).

See [Continuation of Benefits Pending Appeal Decision](#) for the definition of a timely appeal and for more information.

When the Final Decision Reverses the Limited Benefit Plan

Legal reference: 441 IAC 7, 93.15(239B)

Policy: If the final appeal decision reverses the decision to impose the LBP, the LBP is considered imposed in error. The LBP does not count as a valid LBP if the person later chooses another LBP.

Procedure: If the final decision reverses the decision to impose the LBP the IM worker will take action as follows:

- If the LBP was not stopped or assistance did not continue pending the appeal, the IM worker will:
 - Stop the LBP in PJCase as one in error (stop reason “C”).
 - Determine eligibility for corrective benefits.
- If the LBP was stopped and assistance continued pending the appeal, the IM worker will use PJCase to change the stop reason to designate the LBP as one in error (stop reason “C”).

These actions keep the system from considering the LBP as a “valid” LBP if another one is imposed later.

When the Final Decision Affirms the Limited Benefit Plan

Legal reference: 441 IAC 7.9(7), (9), and (10); 7 CFR 273.15(k)(1)

Policy: An LBP with a **new** effective date applies when the final decision affirms the LBP and:

- The appeal was filed:
 - Before the effective date of the initial notice of decision establishing the beginning date of the LBP, or
 - Within 10 days from the date the participant receives the notice establishing the beginning date of the LBP. The date on which the notice is received is considered to be five days after the date on the notice, unless the appellant shows that the appellant did not receive the notice within the five-day period.

- FIP assistance continued pending the appeal decision.

FIP and PROMISE JOBS assistance issued pending the appeal is **not** subject to recoupment when a new LBP effective date applies.

An LBP with the **original** effective date applies when the final decision affirms the LBP and:

- The appeal is a “timely” appeal of a recent notice but not a “timely” appeal of the initial notice issued to start the LBP, and
- The LBP was stopped, and FIP assistance continued pending the appeal decision.

The above situation may occur when another notice of decision regarding the LBP is issued after the initial notice to impose the LBP.

Procedure: IM will use PJCase to reactivate the LBP with a new effective date when:

- The appeal is a “timely” appeal of the notice issued to initially start the LBP, and
- The LBP was stopped, and
- FIP benefits were reinstated pending the appeal.

When an LBP is reactivated with a new effective date, FIP and any PROMISE JOBS supportive payments issued for the months that the appeal was pending are NOT recoupable.

IM will use PJCase to reactivate the LBP with the original effective date when:

- The appeal is a “timely” appeal of a recent notice but not a “timely” appeal of the notice issued to initially start the LBP, and
- The LBP was stopped, and
- FIP benefits were reinstated pending the appeal.

When an LBP is reactivated with the original effective date, FIP and any PROMISE JOBS supportive payments issued for the months that the appeal was pending are subject to recoupment. IM will notify you when this situation occurs. When IM reactivates an LBP in PJCase and FIP is active, the system recalculates benefits, sends a notice to the household, and sends a referral record to notify IWD of the change in FIP status for processing in the IowaWORKS system.

Hardship Appeals

Legal reference: 441 IAC 41.30(3)“f”

Policy: Participants may file an appeal of cancellation of FIP due to the 60-month limit or a denial or cancellation of a hardship exemption.

If the final appeal decision upholds the Department, PROMISE JOBS supportive payments issued pending the appeal are subject to recovery.

Procedure: PROMISE JOBS needs to be involved in an appeal of cancellation due to an LBP that is imposed during a hardship exemption period. Follow the instructions in [PROMISE JOBS Appeal Procedures](#) when you get an appeal for an LBP that was imposed during a hardship exemption period.

Follow the instructions in [PROMISE JOBS Appeal Procedures](#) when you receive an appeal of a 60-month FIP cancellation or from a denial or cancellation of a hardship exemption.

PROMISE JOBS does not need to be involved in an appeal of a 60-month FIP cancellation. However, PROMISE JOBS needs to participate in an appeal of a hardship denial if PROMISE JOBS was involved in the decision to deny a hardship exemption. The IM worker will contact you if you need to be involved in the appeal.

It is important that you and the family’s IM worker coordinate your respective activities when involved in the decision to cancel or deny. When you receive an appeal of the denial of a hardship exemption request, forward a copy of the appeal request to the IM worker. Exchange documentation and other information relevant to the appeal with the IM worker.

If the final appeal decision upholds the family, this may result in a revised 60-month ending date which in turn may affect the family's six-month hardship exemption period and FIA as in the example below:

The family's 60-month FIP period ends 12/31.
12/15 – The worker enters the 60-month FIP cancellation effective 1/1.
12/20 – The family appeals the FIP cancellation. FIP is reinstated for 1/1.
12/21 – The family files a hardship exemption request.
01/18 – The hardship exemption is approved from 1/1 through 6/30.
02/15 – The final appeal decision upholds the family and determines a 3/31 ending date of the family's 60-month period.

A six-month hardship exemption period cannot begin until the family has received FIP for the entire 60-month period. Since the appeal decision moved the 60-month ending date to March 31, the six-month hardship exemption period cannot start until April 1.

The revised six-month hardship exemption is from April 1 through September 30. The IM worker issues a *Notice of Decision* to inform the family of the revised exemption period. The notice also informs the family to contact PROMISE JOBS because the six-month FIA must be amended and that an LBP results for failing to do so.

Appeal Rights Applicable to WEP

Legal reference: 441 IAC 93.15(6)

Policy: A participant who is enrolled in the PROMISE JOBS program may request an appeal hearing if dissatisfied with working conditions, the availability of workers' compensation coverage, or the wage rate used in determining hours of work experience program participation.

Procedure: When any involved party is dissatisfied with HHS' decision on the appeal, inform the dissatisfied party of the right to appeal the issue to the Secretary of Labor within 20 days of the receipt of the Department's final decision. If so desired, assist with appealing the issue to the Secretary of Labor at:

Office of Administrative Law Judges
U.S. Department of Labor
800 K St NW
Washington, DC 20001

Consider the Department's final decision to be received the second day after the date that the written decision was mailed, unless the participant can demonstrate that it was not received on the second day after the mailing date. When the second day falls on a Sunday or legal holiday, extend the time to the next mail delivery day.

The option to appeal to the Secretary of Labor does not preclude a participant from exercising any right to judicial review provided in Iowa Code Chapter 17A or in Department appeal procedures. For more information, see [1-E, Rights Of Appellants After The Final Decision: Judicial Review](#).

Grievances on Displacement Issues

Legal reference: 441 IAC 93.17(239B)

Policy: The PROMISE JOBS program shall provide a grievance procedure to address and resolve public complaints regarding the displacement of regular workers with program participants in a work experience placement.

All employers who participate in the PROMISE JOBS program shall provide assurances that all regular employees are aware of this grievance procedure.

Procedure: Complaints regarding the displacement of regular workers with program participants must be filed in writing and received by the PROMISE JOBS provider agency within one year of the alleged violation.

A representative of the PROMISE JOBS provider agency must:

- Provide the opportunity for informal resolution of the complaint by scheduling a face-to-face interview within seven days of the date the complaint is filed.
- Provide a written notice of the location, date, and time of the face-to-face interview.
- At the face-to-face interview, provide the complainant an opportunity to present evidence.
- Issue a decision in writing within 14 days of the date a complaint is filed.
- Provide a written explanation to all involved parties of the right to file a written appeal, according to HHS appeals procedures, if:
 - The opportunity for informal resolution is declined, or
 - A party receives an adverse decision from the PROMISE JOBS provider agency, or
 - There is no decision within the 14-day period.

To be considered, an appeal must be filed with HHS within ten days of the mailing date of the adverse decision or within 24 days of the date a complaint is filed.

An appeal hearing will not be granted until informal resolution procedures have been exhausted, unless a decision has not been issued within 24 days of the complaint filing date.

HHS shall issue a final decision within 90 days of the date complaint was filed with the PROMISE JOBS provider agency.

Any dissatisfied party shall be informed of the right to appeal the HHS decision within 20 days of the receipt of the Department's final decision to the Secretary of Labor at:

Office of Administrative Law Judges
U.S. Department of Labor
800 K St NW
Washington DC 20036

For the purpose of this policy, the HHS final decision shall be considered received the second day after the date that the written decision was mailed, unless the intended recipient can demonstrate that it was not received on the second day after the mailing date. When the second day falls on a Sunday or legal holiday, the time shall be extended to the next mail delivery day.

The option to appeal to the Secretary of Labor does not preclude an individual from exercising any right to judicial review provided in Iowa Code Chapter 17A or as described in Department appeal procedures. For more information, see [1-E, Rights Of Appellants After The Final Decision: Judicial Review](#).

Upon notice of a complaint or grievance, provide the complaining party with a copy of the grievance procedures, notification of the right to file a formal complaint, and instruction on how to file a complaint. Upon filing a complaint, and at each stage thereafter, each complainant must be notified in writing of the next step in the complaint procedure.

The identity of any person who has furnished information relating to, or assisting in, an investigation of a possible violation must be kept confidential to the extent possible, consistent with due process and a fair determination of the issues.

When a client or a provider receives an expense allowance greater than allowed under these policies or a duplicate payment, an overpayment is considered to have occurred and recovery is required.

Family Self-Sufficiency Grant

Legal reference: 441 IAC Chapter 47, Division II

The Family Self-Sufficiency Grant (FSSG) Program is available statewide for payment to families or on behalf of specific families. The purpose of the FSSG program is to provide immediate and short-term assistance to PROMISE JOBS participant families which will remove barriers related to retaining or obtaining employment and may reduce the length of time a family is dependent on the Family Investment Program (FIP).

Immediate and short-term assistance means assistance provided under this program shall not occur on a regular or ongoing basis and shall be authorized upon determination of need.

Participation on the FSSG program is voluntary. FSSG is not intended to duplicate assistance under regular PROMISE JOBS policies, but is to address barriers to self-sufficiency by meeting expenses that are not approvable under regular PROMISE JOBS policies.

Iowa Workforce Development (IWD) administers the FSSG program for PROMISE JOBS participants referred to IWD for PROMISE JOBS services. IWD allocates a pro-rata share of the funds yearly to each PROMISE JOBS Service Area.

The following sections address:

- [Local plans for FSSG](#)
- [Assistance available in FSSG](#)
- [Application processing](#)
- [Relationship to the FIA](#)
- [Consequences if employment does not occur](#)
- [Reporting participation and authorizing payments](#)
- [FSSG Overpayments](#)

Local Plans for FSSG

Legal reference: 441 IAC 47.26(239B)

Policy: Each PROMISE JOBS service area must develop written policies and procedures for administering FSSG.

The written policies and procedures must be available to the public at HHS local offices and PROMISE JOBS offices.

Procedure: IWD shall use the FSSG base plan, developed in conjunction with HHS. Each PROMISE JOBS Service Area may create a local plan, with additional written policies and procedures not addressed in the base plan, for administering FSSG specific to the local area.

The HHS Community Access Division Administrator and the appropriate responsible IWD administrator must approve any changes to the base plan and PROMISE JOBS Service Area local plans, with additional written policies not addressed in the base plan. The administrators will review the plan for required elements, as described below, and for quality of services to ensure that the plan meets the purpose of the FSSG program before approving it.

The approved plan, with its written policies and procedures, must be available to the public at HHS local offices and PROMISE JOBS offices. You must include a copy of the pertinent sections of your approved local plan for Family Self-Sufficiency Grants with an FSSG appeal summary.

Required Elements for an Approved Local Plan

Legal reference: 441 IAC 47.26(1), (2), and 47.27(239B)

Policy: At a minimum, the policies and procedures of FSSG plans must contain or address the following:

- **A plan overview.** The plan overview must contain a general description detailing:
 - Types of services or assistance that are excluded from consideration for an FSSG in your PROMISE JOBS service area. See [Assistance Available in FSSG](#) for a description of types of assistance.
 - A process for informing candidates of the availability of FSSG funding, its voluntary nature, and how the program works in your PROMISE JOBS service area. See [Assistance Available in FSSG](#).
 - How you will determine that the service or assistance requested meets the FSSG objective of helping the family keep a job or accept a job offer, as described in [Assistance Available in FSSG](#).
 - How you will determine that the proposed FSSG is not supplanting assistance from other programs, as described in [Supplanting](#).
 - Services established and any maximum (and minimum, if any) values of payments for the services established by your PROMISE JOBS service area. See [Total Payment Limit](#) and [Frequency of Assistance](#).
 - Verification procedures or standards for documenting barriers, using written notification policies found at [Written Notice to Participant](#).
 - Application processes and procedures, including how applications will be processed timely to address barriers to obtaining or retaining employment. Define “timely” for your PROMISE JOBS service area. See [Application Process](#).

- Verification procedures or standards for documenting employment attempts if not already tracked by PROMISE JOBS procedures, using policies found at [Job Search Documentation](#) and [Verifying and Projecting Employment Hours](#).
- Follow-up procedures on participant effort.
- Procedures for tracking of FSSG authorizations in order to stay within your PROMISE JOBS service area allocation.
- How your PROMISE JOBS service area staff will be trained to administer the program.
- **Intake and eligibility determination.** Your policies and procedures must describe:
 - How families most likely to benefit from an FSSG are identified in your PROMISE JOBS service area.
 - How families can apply for FSSG assistance in your PROMISE JOBS service area.
 - How HHS local offices and your PROMISE JOBS offices will maintain, provide to participants, and otherwise make available the written policies and procedures describing the FSSG Program.
 - Which PROMISE JOBS staff shall make decisions regarding identification of barriers and candidate eligibility for payment and what local sign-off or approval procedures are required before a payment is authorized.
- Your **plan for evaluation** of Family Self-Sufficiency Grants. Your evaluation plan must:
 - Describe your PROMISE JOBS service area's tracking procedures.
 - Describe your PROMISE JOBS service area's plan for evaluation (e.g., what elements will be used to create significant data regarding outcomes).
 - Describe how measurable results in your PROMISE JOBS service area will be determined.
 - Identify any support you need to conduct an evaluation (e.g., what assistance is needed from HHS and IWD).
 - Describe how you will determine which aspects of the project were successful and which were not.

Assistance Available in FSSG

Legal reference: 441 IAC 47.23(239B) and 47.24(239B)

Policy: FSSG candidates must be PROMISE JOBS participants who have identifiable barriers to obtaining or retaining employment that can be addressed through the FSSG program. HHS, in conjunction with IWD, must determine those barriers to self-sufficiency which can be considered for FSSG.

Participation in the FSSG program is voluntary and must be based on an informed decision by the family.

Procedure: Consider these general criteria when a family requests the FSSG.

- Only a PROMISE JOBS participant can be a recipient of the FSSG.
- In order to be an FSSG participant, the PROMISE JOBS participant must have an identifiable barrier to obtaining or retaining employment that can be substantially addressed through the assistance offered by the FSSG.

Participation in the FSSG program is voluntary and must be based on an informed decision by the family. Do not consider a PROMISE JOBS participant to be choosing the LBP if the PROMISE JOBS participant does not want to be a candidate for the FSSG.

Authorize the FSSG payment for removing identified barriers to self-sufficiency when you and the participant can reasonably anticipate that the assistance will enable the participant to:

- Retain employment
- Obtain employment in the two full calendar months following the date of authorization of payment.

1. On November 20, a candidate applies for an FSSG for auto repair in order to retain employment at a factory in a community 40 miles from her home. She can find no repair shop that will allow her to make payments after repair is completed. There are no car pool options available to the candidate.

The candidate's mother is driving the candidate to and from work but will stop doing so in a few days. The candidate will lose her job within a few days if she does not have reliable transportation. Authorize the FSSG payment at the appropriate time as determined by you and the participant.

2. On November 20, a trained but unemployed candidate applies for an FSSG for auto repair in order to continue job search. Use your knowledge of participant circumstances and of the labor market for this participant to determine whether an FSSG is appropriate.

If you authorize the grant in December, you would look at the likelihood of employment in December, January, or February. If you authorize the grant in November, you would look at the likelihood of employment in November, December, or January.

HHS, in conjunction with IWD, determined those barriers to self-sufficiency that can be considered for FSSG. The barriers are listed in the FSSG base plan and include, but are not limited to:

- Auto maintenance or repair.
- Licensing fees.
- Relocation Assistance
- Housing Assistance
- Transportation, Other Than Vehicle Repair
- Clothing for Employment
- Tools and Equipment
- Grooming and Personal Care
- Utility Services
- Referral to other resources including those necessary to address questions of domestic abuse.

PROMISE JOBS service areas have the discretion to adjust the list of approvable barriers to self-sufficiency in their local FSSG plan based on local resources and circumstances. The HHS Community Access Division Administrator and the appropriate responsible IWD administrator must approve any changes to the list of services in the base plan or IWD PROMISE JOBS service area local plans.

Types of services must be addressed in two ways. FSSG plans must describe:

- Services established by your PROMISE JOBS service area.
- Services or assistance that will be excluded from consideration in your PROMISE JOBS service area.

The HHS Community Access Division Administrator in conjunction with the appropriate responsible IWD Administrator have discretion in determining the payment authorization method.

The approved payment authorization method for each approvable service is identified in your FSSG plan and may include authorization as follows:

- To the participants.
- To a vendor.
- To a provider of support services to the family.

The IWD PROMISE JOBS service area may adjust these payment options in an individual case, based on circumstances and needs of the family with the approval of the HHS Community Access Division Administrator and the appropriate responsible IWD Administrator prior to implementation.

Total Payment Limit

Legal reference: 441 IAC 47.24(3)

Policy: The payment limit per family is \$1,000 per year. This limit is intended to establish a maximum that may be used in removing one or more barriers to self-sufficiency for a particular family. The PROMISE JOBS service area may establish maximums less than this \$1,000 and also may establish minimum payment standards.

A year for a family shall be the 12 fiscal months following the date of authorization of the initial payment for the family. A fiscal month may begin and end in different calendar months. For example, if a payment were authorized on April 15 of the current year, the 12 fiscal months following the authorization date would end on April 14 of the next year.

Frequency of Assistance

Legal reference: 441 IAC 47.24(4)

Policy: A Family Self-Sufficiency Grant is intended to provide immediate and short-term assistance. While a family may be a candidate more than once and may receive payments in consecutive months in some circumstances, payments cannot be established as regular or ongoing.

Procedure: You may authorize FSSG to a family more than once or in consecutive months due to family circumstances, but you must not establish payments that are regular or ongoing.

Grants must meet all of the criteria included here and in your FSSG plan each time you authorize an FSSG.

For example, each FSSG must be authorized only when it is expected that the grant will enable the family to retain employment or obtain employment within the two full calendar months following the authorization date of the grant.

Work carefully with each candidate to be sure that an FSSG is sufficient to remove the barrier at first authorization. If additional barriers arise, the family may be a candidate again within the \$1,000 annual limit or the PROMISE JOBS service area limit, whichever is lower.

If the cost of removing the candidate's barrier is greater than can be met within the \$1,000 annual limit or within any limits as established by your PROMISE JOBS service, refer the candidate to other resources that may be able to assist with the financial need. If FSSG assistance is still needed, during the application process, the family must provide proof that they paid for or will pay the amount that is over the \$1000 limit or any limits established by your PROMISE JOBS service area.

Supplanting

Legal reference: 441 IAC 47.24(5)

Policy: FSSG cannot be used for services already available through HHS, PROMISE JOBS, or other local resources at no cost.

Procedure: Do not authorize an FSSG for services that are already available through HHS, PROMISE JOBS, or other local resources at no cost.

Use your local coordination procedures to develop cooperation among all entities providing social services in your PROMISE JOBS service area. Work together to ensure that responsibilities for funding are not assumed by the FSSG program when they are already available through other community resources.

Application Process

Legal reference: 441 IAC 47.25 (1)

Policy: Each PROMISE JOBS service area shall use the established application form to be completed by the PROMISE JOBS participant and the PROMISE JOBS worker when the participant asks to be a candidate for FSSG.

The application form must contain:

- An explanation of the FSSG program, its voluntary nature, and the expectations of the program.
- Identification of the family and the person representing the family.
- A clear description of the barrier to self-sufficiency to be considered.

- Demonstration of how removing the barrier is related to retaining employment or obtaining employment within two full calendar months after the date of authorization of the grant.
- Demonstration of why other HHS, PROMISE JOBS, or community resources cannot deal with the barrier to self-sufficiency.
- Anticipated cost of removing the barrier to self-sufficiency.

Procedure: When a PROMISE JOBS participant asks to be a candidate for an FSSG, use the developed, standardized statewide FSSG application form, which is to be completed by the PROMISE JOBS participant and the PROMISE JOBS worker. The application form must contain the following elements:

- An explanation of the FSSG program, its voluntary nature, and the expectations of the program.
- Identification of the family and the person representing the family.
- A clear description of the barrier to self-sufficiency to be considered.
- Demonstration of how removing the barrier is related to retaining employment or obtaining employment within two full calendar months after the date of authorization of the grant.
- Demonstration of why other HHS, PROMISE JOBS, or community resources cannot deal with the barrier to self-sufficiency.
- Anticipated cost of removing the barrier to self-sufficiency.

Notification

Legal reference: 441 IAC 47.25(2)

Policy: Form 470-0602, *Notice of Decision: Services*, must be used to notify FSSG applicants of the PROMISE JOBS decision regarding the FSSG.

Approvals must indicate the amount of the benefit that will be issued to the candidate or paid to a vendor, or the service that will be provided to the family.

Denials must indicate the reason for the denial.

Procedure: Use Form 470-0762, *Notice of Decision: Services*, to adequately notify the applicant of the PROMISE JOBS decision regarding the FSSG. On Form 470-0602, *Notice of Decision*, specify:

- Whether or not you are approving assistance under the FSSG program.
- The reason for the denial, if you are not providing assistance.

- The type and amount of the assistance that will be issued to the PROMISE JOBS participant or paid to a vendor or the service that will be provided to the PROMISE JOBS family, if approved.
- The legal authority for the decision (441 IAC 47, Division II).
- That the household has the right to appeal the decision under 1-E, [Appeals and Hearings](#), and under [Appeals](#).

Appeals

Legal reference: 441 IAC 47.25(3) and (4)

Policy: An FSSG applicant or recipient has the right to appeal decisions on FSSG and to request an appeal hearing. No one may limit or interfere with this right.

FSSG applicants or recipients are not entitled to an appeal hearing when the sole basis for denying, terminating, or limiting assistance from FSSG is that FSSG funds have been reduced, exhausted, eliminated, or otherwise encumbered.

Procedure: Your decision on an FSSG may be appealed under HHS appeal policies. See, [PROMISE JOBS Appeal Procedures](#) for instructions on filing an appeal.

When a FSSG applicant or participant files an appeal, PROMISE JOBS is responsible for preparing the appeal summary and attending the hearing since the appeal involves actions that affect PROMISE JOBS only. You must include a copy of the pertinent section of your PROMISE JOBS service area local plan for FSSG with the appeal summary whenever an FSSG candidate files an appeal.

NOTE: PROMISE JOBS participants will **not** be granted an appeal hearing if the sole basis for denying, terminating, or limiting assistance from an FSSG is that FSSG funds have been reduced, exhausted, eliminated, or otherwise encumbered. This policy applies to statewide and PROMISE JOBS service area -allocated funding.

However, you must forward all appeals received to the HHS Administrative Rules and Appeals Unit. They, not the PROMISE JOBS office, will make the decision whether to grant an appeal hearing.

Relationship to the FIA

Legal reference: 441 IAC 47.24(6)

Policy: FSSG is separate from the PROMISE JOBS FIA process. However, the FIA must be honored at all times, and renegotiated and amended if family circumstances require it.

No family is considered to be choosing an LBP if the family chooses not to participate in FSSG.

Procedure: The receipt of the FSSG does not need to be added to the FIA. Using an FSSG may avoid the need to extend the ending date or to change the timing of the steps of the FIA.

Renegotiate and amend the FIA, using all PROMISE JOBS policies regarding the FIA and the LBP, when the FSSG participant's barrier to self-sufficiency will:

- Extend the ending date of the FIA.
- Significantly change the timing of the steps of the FIA.
- Add or delete steps of the FIA in spite of FSSG funding.

Use case file documentation to indicate whether FIA renegotiation and amendment is needed due to the barrier addressed by the FSSG. Use narrative if other case file contents do not clearly indicate the reason for your decision regarding renegotiation.

Do not consider a PROMISE JOBS participant to be choosing an LBP if the PROMISE JOBS participant does not want to be a candidate for an FSSG.

Employment Does Not Occur

Legal reference: 441 IAC 47.24(1)

Policy: There is no penalty and no PROMISE JOBS overpayment if:

- A participant loses employment.
- Expected employment does not occur in the anticipated two-calendar month period.

Procedure: Do not impose a penalty or establish an overpayment if a participant does not retain employment or obtain employment within the two-calendar month period following the date of payment authorization.

Apply all PROMISE JOBS policies regarding job search, employment, and the FIA to PROMISE JOBS participants at all times. If a participant quits a job without acceptable problems with participation or barriers to participation, the PJPM policies at [Refusing, Ending, or Reducing Employment and Other Work Activities](#) apply.

Reporting FSSG Participation and Authorizing Payments

Legal reference: 441 IAC 47.24(7)

Policy: FSSG must be authorized through the PROMISE JOBS expense allowance system.

Payment may be issued to the participants or to a vendor for support services provided to the family. The HHS Community Access Division Administrator, in conjunction with the appropriate responsible IWD Administrator have discretion in determining the payment authorization method.

Payment authorization methods specified in FSSG Plans may be adjusted in an individual case, based on circumstances and needs of the family with the approval of the HHS Community Access Division Administrator and the appropriate responsible IWD Administrator prior to implementation.

Procedure: Use PJCase to authorize the FSSG payment. In PJCase, use component code **10** to indicate approval of an FSSG payment each time you authorize a payment. The start date uses the date you approved the FSSG payment. Use the payment authorization method specified in your FSSG Plan to authorize payments to the client, a vendor, or to a provider of services.

The approved payment authorization method for each approvable service is identified in your FSSG plan and may include authorization as follows:

- To the participants.
- To a vendor.
- To a provider of support services to the family.

The IWD PROMISE JOBS service area may adjust these payment authorization methods in an individual case, based on circumstances and needs of the family with the approval of the HHS Community Access Division Administrator and the appropriate responsible IWD Administrator prior to implementation.

FSSG Overpayments

Legal reference: 441 IAC 47.28(239B) and 47.24(1)

Policy: An overpayment exists when:

- An item(s) for which the funds were awarded were not purchased
- A duplicate payment was issued
- According to the receipts, the item(s) purchased cost less than the funds received.

For the purposes of overpayment and recovery, an FSSG payment is considered a PROMISE JOBS expense payment and is subject to recovery of PROMISE JOBS expense payments.

Procedure:

Consider an FSSG to be an overpayment subject to recovery when:

- An item(s) for which the funds were awarded were not purchased
- A duplicate payment was issued
- According to the receipts, the item(s) purchased cost less than the funds received.

Do not consider an FSSG to be an overpayment when:

- A recipient loses employment
- Expected employment does not occur in the anticipated two-calendar month period following the date the payment was authorized.