

Chapter 6 - COLORADO WORKS, CHILD CARE, AND EMPLOYMENT FIRST

ARTICLE I. - COLORADO WORKS: TEMPORARY ASSISTANCE TO NEEDY FAMILIES

Sec. 6.1.10. -General.
(Reserved)

Sec. 6.1.20. - Supportive Services.

- A. **Introduction.** Child care assistance in the form of cash aid, a vendor payment, or low-income Child Care Assistance may be provided through the Colorado Works program to child-only households, as the need arises.
- B. **Definition.** Appropriate child care is defined as child care that maintains the health and safety of the child while encouraging growth and development.
 - 1. The child care may be provided either by a licensed or exempt child care provider.
 - 2. An unlicensed provider is found unsuitable by Weld County Department of Human Services (WCDHS) if an individual residing in the home, or who has access to the home, has a record of child abuse or neglect, violent behavior, substance abuse or any activity that may endanger the health or welfare of the child.
 - 3. Providers offering specialized care may be available for children with medical conditions of special needs.
- C. **Education.** WCDHS promotes quality education opportunities for low-income children, including, but not limited to, payments for tutoring and one-on-one developmental therapy. WCDHS may provide paid tutoring services and assessments for learning disabilities.
- D. **Supportive Service Payment.** The child may be eligible for service payments up to, but not to exceed, \$750.00 per child, per calendar year. The amount each child is eligible for will be determined on the date the child becomes eligible for Colorado Works.
 - 1. Each child approved for Kinship TANF will be eligible to receive up to \$750.00, per child, per calendar year, based on a need to enhance the child's quality of life and promote stability.
 - 2. Payments will include, but are not limited to, clothing, school supplies and fees, vision and activity fees.
 - 3. A minimum of two estimates will be required for purchases exceeding \$100.00. WCDHS will go with the lowest estimate provided or may choose to find an alternative estimate.
- E. **Authorization of Payment for Supportive Services Limitations.** The below limits set on specific items do not guarantee issuance up to those amounts. WCDHS may provide referrals to other programs or agencies to assist in meeting these needs and/or issue supportive services in a lesser amount if it will meet the need presented.
 - 1. Annual purchases of supportive services per child will be limited to the following unless there is Director Approval:
 - a) Clothing allowance\$500
 - b) School supplies\$75
 - c) Activity fees\$75
 - d) Christmas assistance\$75
 - e) Furniture assistance\$500
- F. **Non-Custodial Parent Services.** WCDHS may provide payments for the services listed below to non-custodial parents who meet the needs standard for Colorado Works. Non-custodial parents do

not need to be attached to an active Colorado Works household to be eligible for services, but must be cooperating with child support services. Services are available as resources allow.

- G. **Family Stabilization.** WCDHS provides payments for a variety of family strengthening and support services including, but not limited to: life skills workshops, parenting classes, support groups, mentoring programs, health and nutrition classes, domestic violence perpetrator treatment, and mental health services.
- H. **Enhanced Family and Employment Supports.** WCDHS may provide payments for employment preparation services or other special needs services to eligible Colorado Works families in need of additional support in finding, attaching to, and retaining employment, based on a thorough needs assessment and as WCDHS resources allow.
 - 1. In addition, WCDHS may offer paid internships on a limited basis to support attachment to the labor market.
 - a) Internship opportunities are developed on an individualized basis in conjunction with the Workforce Innovation and Opportunity Act.
- I. **Types of Purchases Made Through Supportive Services.**
 - 1. Supportive Service purchases for eligible clients include, but are not limited to, the following:
 - a) Tools necessary for employment;
 - b) Vision correction necessary for employment that is not covered by any other employee insurance plan or any other means;
 - c) Dental assistance necessary for employment that is not covered by any other employee insurance plan or any other means;
 - d) Cost of repair of a vehicle to enable transportation to employment-related activity;
 - e) Any other reasonable job-related expense as determined by the Diversion Committee, Employment Services or WCDHS; and
 - f) Transportation.
 - 2. Those transportation costs necessary and directly related to Colorado Works in WCDHS work and/or activity and services participation shall be made according to the individual's situations:
 - a) Calculated at the WCDHS employee reimbursement rate per mile; or
 - b) A flat daily rate of \$5.00 may be provided.
 - 3. Transportation will be paid either to the provider(s) or put on the client's EBT card. These transactions will be randomly audited by the paying agency's supervisor. Clients must provide proof of:
 - a) Vehicle ownership;
 - b) Current driver's license;
 - c) Current proof of insurance on the vehicle; and
 - d) Current proof of vehicle registration.
- J. **Referrals.** WCDHS provides referrals for any available supportive services to applicants and participants. Referrals include, but are not limited to: homeless shelters, physical and mental health services, substance abuse counseling, domestic violence advocacy, legal services, food banks and other program services, as appropriate.
- K. **Payment.** Other assistance/supportive services may not exceed \$2,500.00, per family, within a rolling twelve (12) month period.
 - 1. WCDHS will assess a client who requests Job Retention Support Services as follows:
 - a) Determine the client's financial eligibility for Job Retention Supportive Services;
 - b) Identify the level of benefit the individual needs and eligible for; and

- c) Supportive services will only be paid when the individual(s) are compliant with their IRC.
 - 2. The WCDHS Director or the Director's designee has the discretion to override the amount of other assistance if a hardship exists. The Director, or designee, must document such hardship in CBMS.
 - 3. Assistance may be provided either as a one-time assistance payment or on an on-going basis, both of which are intended to promote sustainable employment and/or engagement in activities and services identified in their IRC.
 - 4. Payments will be made to a participant's EBT card (via direct deposit) or as a direct vendor payment, depending on the nature of the approved expense.
- L. **Additional Cash Assistance.** WCDHS may authorize recurring payments designed to meet the basic ongoing needs of the persons in the assistance unit, as determined by a needs assessment and documented in the individualized plan.
- 1. Basic ongoing needs shall consist of, but are not limited to:
 - a) Food;
 - b) Clothing;
 - c) Shelter;
 - d) Utilities;
 - e) Household goods and general incidental expenses;
 - f) Personal care items;
 - g) Transportation assistance;
 - h) School assistance including fees for extracurricular activities; and
 - i) Child care assistance.
 - 2. WCDHS may allow payments for a special need to a parent or specified caretaker whose child(ren) is eligible and receiving Colorado Works cash assistance.
 - 3. Additional cash assistance may be provided, in addition to the monthly BCA, in order to support specified caretakers to ensure their continued ability to care for children, or support Colorado Works families with an assessed need.
- M. **Assessed Need.** An assessed need is defined as any need of a family receiving WCDHS basic cash assistance, beyond ordinary, routine living expenses.
- 1. Assessed needs include, but are not limited to, the items listed above in all categories for other assistance and supportive services outlined in this policy. Other items may be identified on a case-by-case basis, at the discretion of WCDHS.
 - 2. To unify the work that is done in the community, WCDHS supports the framework around a two-generation approach by linking non-custodial parents to support and services focused on parent-child interactions for fathers and children, as well as economic stability and mobility.
 - a) This whole-family method of delivering services is fostered by ensuring the assessed needs of non-custodial parents are met, enabling them to pay child support while bolstering their employment opportunities.
 - b) Non-custodial parents do not have to meet household composition requirements.
 - 3. For non-custodial parents to receive services, they must be a Colorado resident and a parent of a minor child, and must not be eligible to receive Colorado Works basic cash assistance. All the services WCDHS offers to noncustodial parents are outlined in an individualized plan, and include, but are not limited to:
 - a) Job coaching;
 - b) Parenting skills classes;

- c) Workforce development;
 - d) Mediation; and
 - e) WCDHS Diversion (See State and County Diversion Policy).
- N. **WCDHS Emergency Disaster.** In cases of a declared WCDHS emergency, WCDHS may provide a variety of assistance to meet the unique needs of residents.
1. Eligibility
 - a) Family's annual income must be below \$75,000.00;
 - b) Family assistance unit contains an eligible child, per Colorado Works Program rules;
 - c) Must present a real need for services directly relating to the declared emergency;
 - d) Must prove lawful presence for those required to meet criteria, per Colorado Works Program rules; and
 - e) At the Director's discretion, assistance may be provided to a family who is currently under sanction or disqualification status for Colorado Works.
 2. Payment. Eligible family assistance units will qualify for up to \$3,000.00 depending on available resources.
 - a) Payment of emergency assistance funds will not affect any lifetime maximums on regular County-defined State or County Diversion funds.
 - b) Payments will generally be made directly to vendors.
 3. Timeframe. Funds are available to qualifying families immediately following the WCDHS Director's declaration of an emergency situation.
 - a) Funds must be accessed within six (6) months of the emergency declaration.
 - b) In cases where latent effects of the disaster appear after the six (6) month window (e.g. mental health needs), the family may petition for emergency assistance. Assistance will be granted at the WCDHS Director's discretion.
 4. Eligible Services. Assistance may include, but is not limited to, the following types of assistance:
 - a) Purchase or lease of shelter;
 - b) Home renovations (within the existing footprint);
 - c) Transportation (including car repairs and purchase);
 - d) Non-covered medical expenses;
 - e) Work-related supplies that were lost or damaged;
 - f) Counseling services; and
 - g) Non-medical mental health services.
 5. Process. WCDHS is the payer of last resort. Payments should be made after taking into account insurance payments, other community resources and settlements. In cases of emergency assistance, the assessment and Individual Responsibility Contract (IRC) requirements may be modified to streamline and expedite the process. Receipts are not required.

(Policy of 4-11-2018)

**DEPARTMENT OF HUMAN SERVICES**

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POLICY TITLE	REFERENCE
Diversion (State and County) Program	C.R.S. 26-2-706.6 CDHS Volume 3.606.8
POLICY NO.	EFFECTIVE DATE
6.1.30	January 01, 2021
DIVISION DIRECTOR APPROVAL	BOARD OF WELD COUNTY COMMISSIONERS APPROVAL DATE
February 01, 2021	February 03, 2021

CHAPTER 6 – COLORADO WORKS, CHILD CARE, AND EMPLOYMENT FIRST**ARTICLE I – COLORADO WORKS: TEMPORARY ASSISTANCE TO NEEDY FAMILIES****Sec. 6.1.30 – Diversion****BACKGROUND**

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

PURPOSE

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

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

Families who meet eligibility criteria for basic cash assistance may be eligible for a state diversion payment. Families who otherwise meet the eligibility criteria for basic cash assistance

but are over the income guidelines (needs standard) and whose income less than \$75,000 annually may be eligible for a County Diversion payment.

In Weld County, both state and county diversion are available. They are only to be made when there is no need for ongoing support or more extensive case management or services, and the payment is expected to substantially promote or maintain a family's economic well-being through attachment to employment or another steady source of income. Prior to issuing a diversion payment, Weld County will determine that ongoing need is not anticipated.

POLICY

Weld County provides cash or cash-equivalent payments not to exceed \$2,500 total per family to eligible and suitable families based upon established need, in conjunction with the determination that need is not expected to be ongoing.

Eligibility

To receive a state diversion payment, applicants must be found eligible for basic cash assistance (BCA) by the Colorado Benefits Management System (CBMS). Payments will be made through CBMS. Those who are otherwise eligible for BCA but are over the income guidelines (needs standard) and whose income is less than \$75,000 annually may be eligible for County Diversion.

Need

The applicant must demonstrate a need for a specific item or type of assistance that will promote or help maintain permanent employment, and/or economically stabilize the family, and is likely to ensure long-term economic well-being. The following criteria must be established:

- 1) The applicant (or participant) does not need long-term cash assistance as determined by an assessment;
- 2) The applicant or participant demonstrates a need for a specific item or type of assistance.

This assistance may not extend beyond four (4) months, and those who receive a diversion payment must agree to a 12-month Period of Ineligibility (POI) for Colorado Works (both basic cash assistance and diversion), barring hardship. The POI begins on the first day of the month following the payment month. Hardship for this purpose is defined as an unforeseen, unexpected and otherwise unmanageable event or crisis. The POI may be waived if there is an identified hardship.

Suitability

In order to be eligible for a diversion payment in Weld County, one adult member of the household must meet one or more of the following criteria:

- Be employed or have a verified offer of employment
- Demonstrate the ability to maintain employment during the POI
- Have stable housing
- Have another reliable source of income

Weld County will not provide diversion payments to cover recurring housing costs.

Assessment

Weld County conducts in-depth assessments of family members who have been determined to be a part of the assistance unit at application. A Weld County worker will assess the family to develop the most appropriate plan for them to meet their long-term economic security goals. Diversion payments will be issued based upon assessed need. Weld County workers engage in prospective budgeting and progressive wage employment with applicants to ensure needs can be met after the diversion grant is issued throughout the duration of the POI.

In addition to diversion payments, eligible participants may receive supportive services based on the assessed needs of the family.

Payment

A County Diversion grant may not exceed \$2,500 per twelve-month period per household; a family may not receive more than three diversion payments in a five-year time span. However, the County Director or designee has the discretion to override the number and amount of county diversions if an extreme hardship exists. A diversion payment may not be made in the same month that basic cash assistance is received.

Payments will be issued on an EBT (Electronic Balance Transfer) card (via direct deposit) or paid directly to vendors.

Allowable Use of Funds

Diversion assistance may be used for, but is not limited to, the following types of short-term assistance:

- work-related expenses such as uniforms, dues, or supplies
- transportation costs including car repair, car insurance, and other transportation related expenses.
- housing
- training or education
- participation in the Post-Employment Program
- amelioration of any other identified barrier to employment or economic well-being.

Post-Employment Program

Transitional support may be provided to individuals after obtaining employment to foster job retention. The Post-Employment program will support and encourage a participant to remain employed through time-limited job retention services for individuals who become ineligible for Colorado Works assistance due an increase in earned income. Services will be offered to individuals, on a volunteer basis, who were a Weld County resident prior to becoming ineligible for Temporary Assistance for Needy Families (TANF) benefits, and who have demonstrated a need for ongoing support.

Employment incentives will be issued through the *county* diversion process for individuals who are still employed 90-days and 6-months after exiting due to excess earned income. Participants

in the Post-Employment Program must have an individualized plan that outlines the terms of their participation; this plan must identify the POI for the Post-Employment Program and establish the dollar amount and frequency of incentive payments for job retention. Program participants will receive career coaching as needed (up to monthly) to support workplace success. Intervention and prevention services such as employment counseling and financial and employment retention planning will also be provided.

Weld County will pay a portion of the parental fee for Colorado Child Care Assistance Program (CCCAP) childcare for Post-Employment participants as a supportive service attached to a Diversion payment, up to 4 months after exiting Colorado Works.

Terms

Those receiving a diversion payment in Weld County develop a plan to establish the following:

- 1) Document the reason why ongoing cash assistance is not a need.
- 2) Define the expectations and the terms of the diversion payment.
- 3) Specify the need(s) for and the specific type(s) of non-recurring cash payment; and
- 4) Specify the possible impacts on other assistance including Medicaid, Supplemental Nutrition Assistance Program (SNAP) and childcare.

Payment will be based on the participant's actual estimated need.

Diversion payments will be made at the discretion of Weld County, and as budgets allow. No applicant is entitled to a diversion payment. When necessary, recoveries may be pursued.

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POLICY TITLE	REFERENCE
Nepotism Conflict of Interest	C.R.S. CDHS Volume 3.603.1
POLICY NO.	EFFECTIVE DATE
6.1.40	January 01, 2021
DIVISION DIRECTOR APPROVAL	BOARD OF WELD COUNTY COMMISSIONERS APPROVAL DATE
February 01, 2021	February 03, 2021

CHAPTER 6 – COLORADO WORKS, CHILD CARE, AND EMPLOYMENT FIRST**ARTICLE I – COLORADO WORKS: TEMPORARY ASSISTANCE TO NEEDY FAMILIES****Sec. 6.1.40 – Nepotism/Conflict of Interest****BACKGROUND / PHILOSOPHY**

The County Colorado Works in Weld County Program is designed to support all low-income families in their progression toward economic security. Weld County is committed to providing assistance and services to all who qualify, including those employed by Weld County, or former employees of other counties in Colorado. Weld County will not discriminate nor show bias with these individuals and/or families. If a potential conflict of interest case is identified, a determination will be made regarding the appropriate process and associated actions to be taken on the case.

PURPOSE

The purpose of this policy is to identify the mechanisms by which Weld County prevents conflict of interest or appearance of a conflict of interest from occurring within the Department. To ensure that applicants are provided with assistance and services without concern for preferential or biased treatment by staff, standards and procedures have been developed and outlined by Weld County and are followed by all staff who play a role in the determination of program eligibility and case management functions.

POLICY

Intake

Applications submitted by an employee of Weld County will be processed in a fair and equitable manner and according to the same guidelines as all other applications. No applicant will be discriminated against based upon the applicant's race, creed, religion, political affiliation, sexual orientation, or station in life. In the event an applicant is a blood-relative, relative by marriage or adoption, former spouse or otherwise related to a Weld County employee or elected official, a close friend or any member of the department staff, or any other reasons exists which might create a potential conflict of interest, the Weld County staff member assigned to the case will immediately notify his/her supervisor. If the conflict of interest is associated to the supervisor's relationship with the applicant, the staff member will immediately notify the Weld County director.

Weld County relies upon the discretion and sound judgment of employees to identify situations as described above, and to follow the appropriate protocol. In the event that a staff member, customer, or citizen at large identifies a conflict on behalf of another entity who has not disclosed the potential conflict, such instances will be documented and shared with the supervisor and/or director as prudence requires.

The supervisor reviews the nature of the potential conflict of interest and determines how the application will be processed, which may include, but is not limited to:

- The Eligibility Program Manager processing the case and maintaining case assignment.
- Forwarding the application to a neighboring county for processing.
- Permitting a staff member to process the application and having the process reviewed by a neighboring county prior to benefit issuance.
- Reassigning the case to another Weld County staff member within the Department; or
- Permitting the original assigned county staff member to process the application through regular business process.

Ongoing

For Colorado Works customers who receive a benefit above and beyond basic cash assistance (e.g. supportive services, special needs payments, childcare, monetary incentives, or other supports.) where a conflict of interest may exist, the supervisor and/or director will be notified for approval prior to issuance. Weld County makes every effort to ensure case managers are not asked to handle cases where a conflict of interest may be present but recognizes that sometimes this cannot be avoided. In that circumstance, measures to ensure additional supervision will be made. Customers will be notified of this additional supervision immediately when conflict is identified, and the staff person will assist the customer in accessing the supervisor.

If questions and/or concerns arise regarding the possibility of a conflict of interest during case management or at any time throughout the life of the case, the case manager will consult with the supervisor immediately. The established guidelines as outlined in this policy will then be

followed. Any employee who has reason to believe that another employee is providing a service to a Colorado Works participant that involves payment of governmental funds to the employee or household member of the employee, that employee shall notify the Weld County director immediately. In these instances, the county attorney may be consulted to ensure fidelity to the program is maintained; involvement of the county attorney will automatically result in notification to the state office as well.

Case File Maintenance

In all circumstances, these sensitive cases and associated records are kept confidential in a locked filing cabinet, separate from all other case files, and electronic files are password protected. Case management records and system case notes are only accessible to certain staff with a special security profile, authorized and granted by the system administrator. To assure compliance, Quality Assurance (QA) measures are implemented in Weld County to discourage and detect the occurrence of fraud, and include, but are not limited to the following:

Weld County maintains a separation of functions within the department that are reasonable and required in relation to Department business processes.

A periodic supervisory sampling of cases, including case reviews, to monitor the determination of client and vendor eligibility and the proper calculation and issuance of

- benefits
- The designated worker assigned to the case reviews and verifies all supporting documentation for information supplied by the applicant; and requests and verifies other pertinent information needed at intake and on an ongoing basis

Additional Criteria

At no time will a member of the Weld County staff accept any gift, service, or preferential treatment from an applicant. Any such offer will be reported to his/her immediate supervisor. Workers throughout the Department are encouraged to report any concerns of suspected fraud. (See Weld County Fraud Prevention Policy)

The County Director is notified in all potential conflict of interest cases.

(February 2021)

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POLICY TITLE	REFERENCE
Substance Abuse Screening & Treatment Program	C.R.S. 26-2-703 CDHS Volume 3.606.8; 3.608.1; 3.608.2; 3.608.3
POLICY NO. 6.1.50	EFFECTIVE DATE January 01, 2021
DEPARTMENT DIRECTOR APPROVAL February 01, 2021	BOARD OF WELD COUNTY COMMISSIONERS APPROVAL DATE February 03, 2021

CHAPTER 6 – COLORADO WORKS, CHILD CARE, AND EMPLOYMENT FIRST**ARTICLE I – COLORADO WORKS: TEMPORARY ASSISTANCE TO NEEDY FAMILIES****Sec. 6.1.20 – Substance Abuse Screening & Treatment Program****BACKGROUND**

Weld County prioritizes effectively engaging with families to support their self-sufficiency goals. Employment is one of the best means achieving self-sufficiency goals and avoiding the future need for public assistance.

Weld County has flexibility in determining the most effective approach for accomplishing the four federal purposes of Temporary Assistance for Needy Families (TANF); specifically, crafting services for families with challenges attaining and sustaining employment that appropriately and effectively address their needs and leads to economic security. This may include the identification and treatment of substance abuse as a hindrance to family self-sufficiency. Weld County is committed to ensuring all Colorado Works participants who demonstrate a substance or alcohol abuse problem have this need identified by a trained professional and are presented with the opportunity to receive appropriate treatment as part of their overall path to self-sufficiency.

PURPOSE

The purpose of this policy is to outline a process for identifying criteria and pursuing screening and treatment options in a manner that is positive, respectful, and appropriate considering the overall goal of achieving economic security.

Weld County has identified several criteria that may, in the absence of other explanation or good cause, point to a potential substance abuse problem. These criteria, if observed and documented, may warrant a referral to substance abuse screening by an on-site Certified Addiction Counselor (CAC). At the point that a substance abuse screening indicates the presence of an abuse situation, a treatment plan will be established and treatment provided free of charge to the participant, in accordance with program rule (CCR Volume 3).

DEFINITION

Substance Abuse: A pattern of use of a drug (including alcohol and prescription medications) in which the user consumes the substance in amounts or with methods which are harmful to themselves or others. Use is differentiated from abuse and is marked by behavior that is problematic and harmful; this is particularly relevant to the ability to attain and maintain employment, as well as ensure family well-being.

POLICY

Weld County has outlined the following steps for determining an appropriate referral to substance abuse screening, and, if positive, support a treatment plan in conjunction with an individualized employment plan.

Referral

A case manager may suspect that a participant is substance abuse involved based upon any of the following criteria, *in the absence of any other explanation or good cause* (e.g. known physical or mental health issues, domestic violence, etc.):

1. Observations of physical symptoms (e.g., slurred speech, confusion, smell of alcohol or marijuana, or other unusual behaviors)
2. Chronic missed appointments without other explanation (three in six months)
3. Child welfare referral indicating substance abuse
4. Self-declaration
5. Report from credible third party
6. Lack of progress in individualized plans

If any of the above criteria exists, every reasonable effort should be made to establish good cause prior to initiating a referral to substance abuse screening. A referral for screening should take place only *after* a discussion with the participant has ruled out good cause or other contributing factors. The referral should be made in a respectful, courteous manner, and may be included as an element in the individualized employment plan, at the determination of both the case manager and the participant. If included in the individualized plan, it should be messaged as a resource and support to the participant's overall goal.

A participant has the right to refuse the referral. In the event that the referral is refused, the case will be staffed with the supervisor and the CAC to ensure a screening is in fact warranted. If staffing confirms the appropriateness of screening, and the participant continues to refuse to engage, the county will follow appeal and sanctioning policies as outlined in program rule.

If the participant agrees to screening, but does not show up for a screening appointment, the same protocol applied to other missed appointments/non-compliance will be followed.

Screening

Weld County Department of Human Services will employ a full time CAC for substance abuse screening. The screening for substance abuse will be made using the Adult Substance Abuse Subtle Screening Inventory (SASSI). The counselor may also recommend the use of a diagnostic urine test, contingent upon the results of the SASSI. These screening services will be provided free of charge to the participant, and every reasonable effort to accommodate the participant's other obligations (e.g. work or childcare) will be made. Should treatment be necessary, the CAC will work with a contracted treatment provider such as North Range Behavioral Health.

Treatment

Should the screening identify that the individual has a substance abuse problem; a treatment plan will be developed by the participant and the CAC. The conditions of the treatment plan may be included in the individualized plan, as appropriate, and the county may use a county-defined hold to enable the participant to engage fully with treatment, in combination (or in lieu of) other work activities, as recommended by the treatment provider.

The development and monitoring of the treatment plan and associated progress will be the responsibility of the CAC, with support as requested from the Colorado Works case manager. Treatment focus is to assist the customer to participate successfully in the Colorado Works program, and to attain economic security and well-being. Treatment may identify other physical and mental health needs, and efforts should be undertaken to satisfy those needs, as they relate to overall program success.

(February 2021)

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POLICY TITLE	REFERENCE
Quality Assurance Fraud Prevention	C.R.S. 26-1-112; 26-1-118; 26-2-703 (17.5) CDHS Volume III 3.609 CDHS Fraud Prevention Manual
POLICY NO.	EFFECTIVE DATE
6.1.60	January 01, 2021
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CHAPTER 6 – COLORADO WORKS, CHILD CARE, AND EMPLOYMENT FIRST**ARTICLE I – COLORADO WORKS: TEMPORARY ASSISTANCE TO NEEDY FAMILIES****Sec. 6.1.60 – Quality Assurance/Fraud Prevention****BACKGROUND / PHILOSOPHY**

The fundamental values of the Weld County Colorado Works program include respecting the dignity and well-being of all people, promoting self-determination, honoring cultural diversity, advocating for social justice, and acting with integrity, honesty, genuineness, and objectivity. Program staff considers these standards in ethical and professional decision making. It is the intent of Weld County to promote consistent organizational behavior and develop effective working relationships with human services system and community partners. We respond to the direction of human needs and human circumstance and enhance customer safety, independence, functioning, health and well-being within the context of our community and environment. Likewise, we uphold the integrity and ethics of our own profession, and continually work to increase our professional growth. Finally, we recognize and build on customer and community strengths, and value the accountability of the use of public dollars by maximizing efficient use of resources.

PURPOSE

The Weld County Quality Assurance and Fraud Prevention policy is established to facilitate the development of systems that will aid in the prevention and detection of internal and external fraud. It is the intent of Weld County to take all allegations of fraud seriously, to investigate all allegations of fraud appropriately, to maintain procedures for assessing the risk of fraud and to educate staff and partners at all levels on fraud awareness and relevant procedures.

This policy contains the standards and framework for the maintenance of program integrity that ensures program accuracy and prevents the misuse of benefits. This policy applies to any irregularity, or suspected irregularity, involving employees as well as customers, contractors, vendors, consultants, stakeholders, and/or other outside agencies with a business relationship with the department.

POLICY

Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Weld County management staff is responsible for the prevention and detection of fraud.

Risk Assessment

Each member of the management team will be familiar with the types of fraud that might occur within his or her area of responsibility. Management staff is aware of specific behaviors within their work group that can signal that the environment is at high risk for fraud. A risk assessment checklist has been developed and is used in each program area. Staff is prepared to prevent and/or minimize the development of these risks as well as manage these risks and their potential impact in a professional manner.

STRATEGIES

Internal Controls

Fraudulent acts committed by employees of Weld County may include theft or misuse or misrepresentation of data for use in determining eligibility and grant amounts. Common methods and types of internal fraud identified by departments of human services include:

- Deliberate overpayment of benefits to customers
- Creating false persons and applications
- Reporting false information on behalf of the customer
- Transactions (e.g., expenses, income.) recorded for incorrect sums
- Altering amounts and details on client documents/cases
- Over-riding denial/fail decisions so as to approve benefits
- Misappropriation of funds
- Unauthorized transactions
- False identification used
- Creating false addresses
- Reversing claims and overpayments without resolving
- Removing benefits from client accounts

- Falsifying documents
- Forged signatures
- Accessing benefits of deceased clients
- Claiming mileage for destinations not traveled

Management staff, in conjunction with Organizational Integrity and Weld County Human Resources, will resolve irregularities concerning an employee's ethical or behavioral conduct.

Protocols | *Other Criteria*

(See Weld County Nepotism/Conflict of Interest Policy)

External Controls

Weld County addresses Fraud Prevention with our customers using a strength-based approach. We strike a balance between encouraging independence and family well-being and committing to the prevention, detection, and correction of misconduct and dishonesty. At eligibility, Weld County staff reviews and verifies supporting documentation provided by the applicant on the application, and requests pertinent information as necessary to determine program eligibility. Workers will, whenever possible, contact the county or state in which the applicant formerly resided (if applicable) to gather information needed to conform eligibility of the applicant including, but not limited to, previous eligibility, sanctions, work history, and fraudulent activities. A Weld County staff member verifies household composition, employment, and residence status by the following procedures which include, but are not limited to:

- Interfaces
- Collateral contacts
- Unannounced home visits
- Other legal means deemed necessary to determine eligibility

A Weld County staff member who discovers or suspects fraudulent activity will:

- Verify the fraud
- Establish a recovery for the over issuance period
- Document the recovery in CBMS case comments
- Complete an investigation referral form
- Attach the investigation referral form to case record and submit to supervisor for review
- Program Administrators review and approve the referral for investigation and forwards to the Fraud Investigator
- A record of all fraud referrals is maintained by the Administrator

Prudent Person Principle | Collateral Contact

When necessary and practical, Weld County implements procedures for independent verification of customer information. We check on addresses, Social Security Numbers and other case information. Examples of checking on customer information include, but are not limited to:

- Checking addresses in Google, and/or other search engines

- Checking addresses with the county assessor
- Checking Social Security Numbers for validity or duplication
- Contacting Landlords
- Confirming family membership and their identities
- Calling Employers
- Checking School records
- Contacting Car Dealers

Monitoring

Weld County utilizes effective interviewing techniques throughout the life of a case to prevent and detect fraud. Additionally, Supervisors and Administrators run a variety of reports to review case work for abnormalities, payments over a specific threshold limit, Diversions, supportive services, and other activities that may point toward fraud. The Administrators and the Business Office review payment patterns and statistics. Reports reviewed include, but are not limited to:

- Payments over \$1,500
- Daily Issuance Participation Report
- Security Profiles in the Colorado Benefit Management System (CBMS)
- Supervisory authorization at specified levels of benefit approval
- Death Match Report
- PARIS
- Out of State Electronic Benefit Transfer (EBT) Usage
- Duplicate Social Security Number (SSN) Report
- Income Eligibility Verification Services (IEVS) Reports
- EBT Prohibited Access Reports

The Administrators and the Business Office use application logs and other internal tracking devices to cross reference specific case actions.

The Weld County Quality Assurance Team uses Transaction Case Sampling to pull a percentage of case actions for each worker. Supervisors then review and authorize. This process is instrumental in preventing and detecting fraud, and enhancing our ability to find errors, target training and staffing needs, and ensure that our customers are receiving appropriate benefits and services.

Reporting Procedures / Fraud Investigations

Weld County staff are encouraged to report concerns to the Weld County Fraud Investigator, who prepares a written report for Administrators and the Business Office to review and determine what, if any, further action will be taken. Actions can include, but are not limited to:

- Determination that no fraud was committed
- Further investigation is required
- Determination of the amount of overpaid benefits
- Referral back to the case manager
- Termination of assistance
- Administrative hearings

- Referral for establishment of account receivable
- Referral to the District Attorney (DA) for prosecution

The State Fraud Hotline is maintained to encourage the public to report suspected fraud 24 hours a day by telephone at 1-877-934-6361, by fax at 303-866-7332, or via –mail at colette.kreger@state.co.us.

Confidentiality

Weld County staff and others involved in the process of fraud investigation treat all information received confidentially. Investigation results will be disclosed or discussed on a “need to know” basis only. This is important to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct. Any employee who suspects dishonest or fraudulent activity will notify the director, or designee, immediately, and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act.

Staff Training

New staff is trained at the time of hiring on the department’s values and code of ethics. The training explicitly covers fraud awareness and prevention with a positive tone, and stresses the expectations on all employees regarding their duty to communicate certain matters, specific examples of suspected fraud, and how to report. The Weld County fraud investigator conducts employee trainings and provides updated materials to employees on an annual basis. Ongoing training is offered through the Colorado Welfare Fraud Council (CWFC) and the state Division of Employment and Benefits Professional Development Academy.

(February 2021)

Sec. 6.1.70. - Community Investment-Summer Youth Voucher Program.

A. **Introduction.** Weld County Department of Human Services (WCDHS) will fund appropriate and available summer activities as a Colorado Works, Community Investment program. The activities will be offered to low-income youth, foster care and adoptive children annually, so long as funding is made available. The purposes of these activities are to:

1. Prevent youth from entering the Child Welfare system.
2. Support County Certified Foster Care Parents and Adoptive Parents with summer activities for foster care and adoptive children.
3. Promote a continuum of educational, physical activity and community experiences through established recreational or educational programs during the summer.

B. **Eligible Participants.**

1. Children, ages infant through seventeen (17) years of age; and
2. Children who are in families receiving TANF, Food Stamps and other WCDHS approved programs and have a household income below \$75,000; or
3. Children who are foster care and adoptive children, in the Pillars for Successful Independence (PSI) or Chafee Program.

([Policy of 3-18-2020\(6\)](#))

**DEPARTMENT OF HUMAN SERVICES**

315B NORTH 11TH AVENUE

PO BOX 1805

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POLICY TITLE	REFERENCE
Hardship Extension (60-Month)	C.R.S. 26-2-716(5) CDHS Volume 3.606.6
POLICY NO.	EFFECTIVE DATE
6.1.80	January 01, 2021
DIVISION DIRECTOR APPROVAL	BOARD OF WELD COUNTY COMMISSIONERS APPROVAL DATE
February 01, 2021	February 03, 2021

CHAPTER 6 – COLORADO WORKS, CHILD CARE, AND EMPLOYMENT FIRST**ARTICLE I – COLORADO WORKS: TEMPORARY ASSISTANCE TO NEEDY FAMILIES****Sec. 6.1.80 – Hardship Extension (60-Month)****BACKGROUND**

The Colorado works in Weld County program is designed to support low-income families in their progression toward economic well-being. Weld County recognizes that this progress may take more time for some families than for others, and therefore, has created this policy to ensure extensions to program benefits are provided where feasible and appropriate and within federal and state program guidelines. An assistance unit containing an individual who has received Federal Temporary Assistance for Needy Families (TANF) assistance in Colorado or another state(s) as an adult for sixty (60) cumulative months shall not be eligible for Federal TANF assistance unless granted an extension by the county department due to hardship or domestic violence. Assistance units that contain excluded members shall not be eligible for consideration of an extension.

PURPOSE

The purpose of this policy is to establish the criteria for a hardship extension (also see “Domestic Violence/Family Violence Option Policy”).

POLICY

All participants, with the exception of assistance units containing excluded members, may request an extension when a hardship exists. A participant's request for an extension can be made in person, by phone, or in writing. Extensions may be granted for up to six months; additional extensions may be granted if circumstances warrant the extension and it is requested prior to the end of the current extension. If a participant fails to request an extension on a timely basis, an extension may be granted at the discretion of the Department Director for the Weld County Department of Human Services.

Eligibility

Weld County will consider a hardship extension if one or more of the following criteria exist:

- Inadequate, or unavailable:
 - Childcare
 - Housing
 - Transportation
 - Employment opportunities, including but not limited to:
 - When layoffs occur
 - Wages are below applicable federal and state minimum wage standards
 - Working conditions present a risk to health or safety
 - Workers' Compensation protection does not exist
 - Lack of jobs due to high unemployment rates and poor labor market in region
 - Available jobs do not align with skills or career profiles, on a case-by-case basis
- Disability of the specified caretaker or child, verified by a certified professional;
- Involvement in the legal system by a member of the assistance unit;
- Family instability, which may include but is not limited to, a specified caretaker with the inability to maintain stable employment or care for the children in their own home or in the home of a relative based on the assessment;
- Domestic Violence issues as determined by the Department's Domestic Violence Policy

Weld County will notify all participants who are approaching the 60-month time limit on Colorado Works assistance, starting at 55 months. Weld County will make all reasonable efforts to contact the participants by phone or in person to explain the extension process to accept a request for an extension.

The Department will make a determination to grant or deny the extension within 30 days of receiving the customer's request for extension. The Department will provide written notification to the participant and if the extension is denied, the notice will include the reason for the denial and explain the appeal process.

Additional Criteria

Weld County will work with participants to develop an individualized plan that will include participation activities along with county and community supports to address the causes of the extension. Additionally, the plan will include sanction procedures for failing to comply and appeal rights.

Good cause for non-compliance with the conditions of the hardship extension plan are the same as any other individualized plan developed and agreed upon, and include, but are not limited to:

- Total disability of the participant or the participant is needed in the home to provide full-time care for their disabled child. The disability of the participant or the child must be verified and documented by a medical statement
- Victims of domestic violence who risk endangering themselves or their children by participating in a Colorado Works activity
- Death of an immediate family member
- Jury duty
- Other documented household circumstances determined by Weld County

Order of Selection Upon Meeting the 20% Allocation of Extensions

A. The Department will use an order of selection process when:

1. The number of Colorado Works recipients who have been granted extensions exceed the percentage of Weld County' cases used to establish the 20% maximum statewide caseload pursuant to Federal Law and Colorado State Rules, and
2. The Department is unable to serve all eligible Colorado Works recipients from Weld County who have requested an extension due to hardship.

B. The order of selection will be based on criteria and definitions similar to that used by the Colorado Department of Vocational Rehabilitation and will be implemented in order to assure compliance with 20% maximum caseload rule as follows:

1. **First Priority – Most Significant Disability.** An individual who has a severe physical or mental impairment, which seriously limits three or more functional capacities (mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of employment outcome.
2. **Second Priority – Significant Disability.** An individual who has a severe physical or mental impairment, which seriously limits one or two functional capacities (mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of employment outcome.
3. **Third Priority – Least Significant Disability.** An individual who does not meet the criteria for “most significant disability” or “significant disability” is considered to have the least significant disability.

County Provisions related to Native Americans/Alaskans

Any month of receipt of assistance by an adult while living in Indian Country, or a Native Alaskan village where at least 50% of the adults were not employed will not be counted toward the 60-month lifetime limit. Up to 20% of the county caseload may be granted an extension beyond the 60-month lifetime limit due to hardship or domestic violence.

(February 2021)

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POLICY TITLE Domestic Violence	REFERENCE C.R.S. 26-2-716 CDHS Volume 3.602; 3.604.2
POLICY NO. 6.1.90	EFFECTIVE DATE January 1, 2021
DEPARTMENT DIRECTOR APPROVAL February 01, 2021	BOARD OF WELD COUNTY COMMISSIONERS APPROVAL DATE February 03, 2021

CHAPTER 6 – COLORADO WORKS, CHILD CARE, AND EMPLOYMENT FIRST**ARTICLE I – COLORADO WORKS: TEMPORARY ASSISTANCE TO NEEDY FAMILIES****Sec. 6.1.90 – Domestic Violence****PURPOSE**

Domestic Violence issues may prevent an individual from engaging with the standard components of the Colorado Works Program. Weld County will conduct a screening and assessment and will provide specific information, materials, and services that support individuals involved in family (domestic) violence, as defined in Colorado Works program rule.

POLICY

The Weld County procedure allows applicants and participants to voluntarily and confidentially self-identify as victims of family (domestic) violence, by providing multiple, safe opportunities for participants and applicants to disclose this information and using trained staff to conduct routine assessments. Weld County reserves one interview room for screening and/or discussing issues related to domestic violence. This designated room has the ability to be locked. Self-disclosed information remains confidential, unless an immediate threat to safety or well-being is present.

Weld County provides referrals to appropriate domestic violence advocacy, counseling, and support services, to include the Weld Shelter, the Weld County Public Health agency, law enforcement, legal aid, and Family Tree Counseling. Brochures and other informational handouts regarding Domestic and Family Violence issues are distributed and available in English and Spanish to all Colorado Works applicants and participants. Information is located in our lobby and all common areas, and includes, but is not limited to, material from local domestic violence and batterer's intervention service providers, criminal justice, victim advocate organizations, victim's compensation, and a domestic violence safety plan.

All Colorado Works applicants will be screened and identified using the state's domestic violence screening form. Screening will occur during initial application and be addressed again at orientation and during one-on-one case management, as warranted.

Waiver

Weld County will offer a good cause waiver that exempt program participants who have experienced or are experiencing family violence from Colorado Works work activities, and/or increased months to the 60-month TANF time limit, and/or the requisite engagement with child support services. Weld County will involve the participant in the invocation of any waiver; the participant may accept or refuse any waiver offered. Good cause is granted as follows:

1. Work activities/time clock: If a customer is identified as a survivor of domestic violence that interferes with the safety and/or ability to participate in the Colorado Works Program, counties must offer the customer a waiver
2. Child Support Services: If a customer is identified as survivor of domestic violence and seeking child support services would potentially endanger or unfairly penalize her or her family if she participated in the program requirement, counties must offer a child support engagement waiver to the survivor

Individuals receiving a waiver will be referred immediately to the appropriate domestic violence advocacy and support services. Individuals will also be provided information about and, if requested, enrolled in the statewide Address Confidentiality Program (ACP). This referral and associated services will be captured in the individualized plan and reassessed every six months.

Waivers will be accompanied by documentation describing the following:

1. Past, present and ongoing impact of family violence on the individual and family
2. Individual's available resources
3. Specific program/work components being engaged in as well as those waived
4. While maintaining safety of the individual as a priority maximize opportunities to engage in education, training, work, and other activities leading to family financial security

Training

Weld County staff will receive state-sponsored training in recognizing, responding, and referring survivors and/or perpetrators of domestic violence, including associated impacts on economic independence and community resources. All staff who play a role in working with Colorado

Works applicants and customers (i.e. intake, eligibility, assessment, case management, sanctioning, or workforce development) will be trained; training will be taken at least once every five years. Weld County supplements state trainings that are offered with internal trainings provided in collaboration with the local and/or state domestic violence programs or agencies.

Weld County requires that any contractor who plays a role in working with Colorado Works applicants and customers (e.g., intake, eligibility, assessment, case management, sanctioning, or workforce development) will be trained will complete the state-sponsored domestic violence course. Certification of domestic violence training will be included in all contracts for such services. Weld County will verify that each contractor's staff member as described in this paragraph has been trained.

(February 2021)

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POLICY TITLE County Emergency Disaster Program	REFERENCE C.R.S. 26-2-137; 26-2-703; 26-2-706.6 CDHS Volume 3.606.8; 3.609.961
POLICY NO. 6.1.100	EFFECTIVE BEGIN DATE <i>(Date disaster is declared)</i> EFFECTIVE END DATE <i>(Date the county expects the disaster to end. This can be months in advance but is needed to program CBMS changes)</i>
DIVISION DIRECTOR APPROVAL February 01, 2021	BOARD OF WELD COUNTY COMMISSIONERS APPROVAL DATE February 03, 2021

CHAPTER 6 – COLORADO WORKS, CHILD CARE, AND EMPLOYMENT FIRST**ARTICLE I – COLORADO WORKS: TEMPORARY ASSISTANCE TO NEEDY FAMILIES****Sec. 6.1.100 – Emergency Disaster Program****BACKGROUND**

In cases of a declared county emergency, the county may provide a variety of assistance to meet the unique needs of residents.

POLICY**Eligibility**

- Family's annual income must be below \$75,000
- Family assistance unit contains an eligible child, per Colorado Works Program rules
- Must present a real need for services directly relating to the declared emergency
- Must prove lawful presence for those required to meet criteria, per Colorado Works Program rules

- At the director's discretion, assistance may be provided to a family who is currently under sanction or disqualification status for Colorado Works

Payment

- Eligible family assistance units will qualify for up to \$3,000 depending on available resources.
- Payment of emergency assistance funds will not affect any lifetime maximums on regular county-defined State or County Diversion funds.
- Payment type will typically be vendor payment, other options may be available at the discretion of the County Director.

Timeframe

- Funds are available to qualifying families immediately following the County Director's declaration of an emergency situation.
- Funds must be accessed within six (6) months of the emergency declaration.
- In cases where latent effects of the disaster appear after the six (6) month window (e.g. mental health needs), the family may petition for emergency assistance. Assistance will be granted at the County Director's discretion.

Eligible Services

Assistance may include, but is not limited to the following types of assistance: purchase or lease of shelter; home renovations (within the existing footprint); transportation (including car repairs and purchase); non-covered medical expenses; work-related supplies that were lost or damaged; counseling services; non-medical mental health services.

Process

- In cases of emergency assistance, the assessment and Individualized Plan (IP) requirements may be modified to streamline and expedite the process.
- Receipts are not required.

(February 2021)