		BOARD POLICY		POLICY NUMBER 100-24
Title:	Temporary Cash Assistance Time Limits and Hardship Extensions			
Effective:	12/19/2024	Revised:		
Supersedes:		Version:	01	

I. OF INTEREST TO

This policy is applicable to Local Workforce Development Board (LWDB) 23 and CareerSource South Florida (CSSF) American Job Centers (AJCs).

II. PURPOSE AND SCOPE


The purpose of this program policy is to provide AJC's with information on time limits to Temporary Cash Assistance (TCA) and instructions on processing extensions to TCA time limits.

III. BACKGROUND

The 1996 Personal Responsibility and Work Opportunity Reconciliation Act, PRWORA, changed cash assistance from an open-ended entitlement program to a time limited cash assistance program designed to move families away from government dependency and towards self-sufficiency. The federal law gave states the option to establish TCA time limits not to exceed the federal limit of 60 months unless the individual met a hardship. The Florida State Plan establishes a lifetime limit of 48 months. The State may extend an individual's cash assistance time limits based on the State's definition of a hardship.

In 2000, Senate Bill 2050 (Chapter 445 F.S.) established that each time limited recipient of TCA would be assigned a periodic time limit. Essentially, the lifetime limit of 48 months was divided into two time periods. The 2000 legislation also defined the criteria for recommending an extension to the time limits. The Department of Children and Families (DCF) was directed to work with Workforce Florida, Inc. (WFI) to establish procedures for reviewing Welfare Transition cases prior to the individual meeting their first periodic time limit. Prior to time limits expiring, the law also required the Local Workforce Development Boards (LWDBs) to conduct an employability review with each participant approaching the last six months of their TCA periodic time limit. The LWDB is required to provide a recommendation for an extension to time limits if one is requested.

During 2005, Chapter 445 regarding TCA time limits was changed. Senate Bill 408 removed periodic time limits and, an individual is now assigned a lifetime limit of 48 months at initial approval of TCA. As a result of removing periodic time limits:

Approved By: Rick Beasley, Executive Director	Signed by:  <small>9FE97C26D3D0404...</small>	1/16/2025
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- TCA recipients may no longer earn additional months for working and complying with program requirements;
- TCA recipients may no longer earn months to extend receipt of cash assistance for the successful completion of substance abuse and mental health treatment programs; and
- The LWDB is now required to conduct an employability review prior to the individual meeting their lifetime limit of 48 months.

Included in Senate Bill 408 was language that deleted the requirement to align the composition of a review panel with the racial, gender and ethnic diversity of the community. Elements not modified by the 2005 legislative changes include:

- An employability review must be conducted by the LWDB designee within six months of the individual's time limit.
- A recommendation to extend time limits must be based on the criteria established under 445.105 (F.S) and further defined under 65A-4.201 (FAC).
- Florida Statutes provide for an extension of cash assistance time limits based on the status of an individual's Social Security Income (SSI) or Social Security Disability Income (SSDI) application or appeal.
- The number of individuals with a time limit extension beyond the 48 months (State) or the federal 60 month lifetime period cannot exceed 20 percent of the average monthly caseload.
- For individuals who have moved from another state, the months in which TCA was received under the TANF block grant in that other state, will count towards the cumulative 48-month limit.

In 2024, Florida House Bill 1267 passed adding that LWDB must administer during the hardship review screening process the following:

- Exit survey - collects information, which can be used to discern programmatic impacts on individuals over time.
- Career Ladder Identifier and Financial Forecaster (CLIFF) – identifies an immediate path to financial stability.

IV. STATUTORY AUTHORITIES

[Florida Administrative Code 651-4.201](#)

[Florida Statute 414.0252](#)

[Florida Statute 414.105](#)

[Florida House Bill 1267](#)

V. DEFINITIONS

Workforce Florida Inc. (WFI) – Currently known as CareerSource Florida

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Welfare Transition – Regionally referred to as Career Advancement Program (CAP)

VI. ACRONYMS

1. American Job Center - provides universal access to an integrated array of labor exchange services so that workers, job seekers, and employers can find the services they need
2. ARP – Alternative Responsibility Plan
3. CLIFF- Career Ladder Identifier and Financial Forecaster
4. Department – means the Department of Children and Families (DCF)
5. Homeless – means an individual who lacks a fixed, regular, and adequate nighttime residence or an individual who has a primary nighttime residence that is:
 - a. A supervised publicly or privately operated shelter designed to provide temporary living accommodations, including welfare hotels, congregate shelters, and transitional housing for the mentally ill;
 - b. An institution that provides a temporary residence for individuals intended to be institutionalized; or
 - c. A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.
6. Domestic violence – means any assault, aggravated assault, battery, aggravated battery, sexual assault, sexual battery, stalking, aggravated stalking, kidnapping, false imprisonment, or any criminal offense that results in the physical injury or death of one family or household member by another.
7. IRP – Individual Responsibility Plan
8. LWDB – Local Workforce Development Board
9. Participant – means an individual who has applied for or receives temporary cash assistance.
10. Minor child – means a child under 18 years of age, or under 19 years of age if the child is a full-time student in a secondary school or at the equivalent level of career training, and does not include anyone who is married or divorced.
11. PRWORA – Personal Responsibility and Work Opportunity Reconciliation Act
12. SAMH – Substance Abuse or Mental Health
13. TANF – Temporary Assistance for Needy Families
14. Temporary Cash Assistance – means cash assistance provided under the state program certified under Title IV-A of the Social Security Act, as amended.

VII. POLICY

A. Time Limits and Episodes of Eligibility

The state of Florida Welfare Program has a lifetime cumulative total of 48 months as an adult, with the exception of hardship cases where participants have applied for permanent disability through the Social Security Administration. The Department of Children and Families (DCF) is responsible for determining that the correct time limit has been assigned to the participant and for reviewing the participant's case to determine if earned months are available.

The AJC staff shall review cases where the participant is within six months of the end of their assigned time limits for a possible hardship extension of their TCA benefits. The AJC staff is responsible for reviewing the participant's employment potential and assessing if the participant should be recommended for a hardship extension.

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Participants are not required to request an initial hardship extension; however, they may request a hardship when their initial assigned time limit has expired.

All participants for whom a hardship extension is recommended, shall be required to enroll in CAP as a condition of granting the hardship extension. Once enrolled in CAP, the participant must report to the assigned AJC. Once enrolled AJC staff must sanction those participants who fail to report to CAP. The AJC staff must submit the completed and signed Primary Eligibility Screening Tool, the corresponding supporting documentation along with the Hardship Extension form to CareerSource South Florida (CSSF).

Newly arrived state residents: Families who have moved to Florida from another state and who had previously received Temporary Assistance for Needy Families (TANF) in another state will have those months of TCA received counted towards the cumulative 48-month life time limit for TCA in Florida.

B. Earned Months of Extended TCA Benefits

Up to 12 months of extended TCA benefits may be earned by participating for complying with the following activities:

1. A TCA participant who is not exempt from work activity requirements may earn one month of extended TCA eligibility, up to a maximum of 12 additional months, for each month that the participant is fully complying with work requirements, i.e., working a minimum of 30 hours a week in subsidized or unsubsidized employment. The earned income must be reported and included in the TCA budget. The earned months will be calculated and recorded by DCF. The additional months earned must be used before the Hardship Extension months are used.
2. A TCA participant who is not exempt from work activity requirements and who participates in a recommended substance abuse or mental health treatment (SAMH) program, may earn one month of extended TCA eligibility for each month of full compliance with the treatment program requirements (while receiving TCA), up to a maximum of 12 additional months.

The treatment credit may be awarded only upon the successful completion of the treatment program and only once during the 48-month TCA lifetime limit.

C. Hardship Extensions to Time Limitations

A hardship extension extends the time limit episode for an individual's receipt of TCA. The granting of a hardship extension does not exempt the participant from the work activity requirements or the lifetime limit of 48 months. Additional hardship extensions beyond 48 months lifetime limit may be given to participants with a minor child, as determined by DCF Office of Family Safety and Preservation, or to participants who have a pending SSI application.

DCF will approve or deny extensions of cash assistance based on policy, the participant's request, and the AJC staff recommendation. Hardship Extensions must be processed timely to avoid discontinuation of TCA at the end of the established periodic or lifetime

limit. Prior to any approval, *diligent participation* and *employment potential* must be explored,

D. Eligibility Criteria for Hardship Extension

1. Diligent Participation

The participant shall not have had more than one work sanction imposed in the last 18 months of receipt of TCA, be in satisfactory compliance with the Individual Responsibility Plan (IRP) or Alternative Responsibility Plan (ARP) as determined by the AJC, **and** have one or more of the following characteristics:

- The inability to obtain employment, and/or;
- Extraordinary barriers to employment: the inability to obtain childcare, medical incapacity, having a child less than 3-months of age or other conditions that may result in an exemption to work requirements and/or;
- Significant barriers to employment (high unemployment rate, local labor surplus, underemployment, unavailability of support services, domestic violence, language barriers/illiteracy, homeless, felony conviction) combined with a need for additional time, and/or;
- The need by teen parents to have 24 months of eligibility after receipt of a high school diploma or GED; or
- A minor child and has reached the end of the established time limit (In this case the DCF Office of Family Safety and Preservation reviews and can make recommendation of extension of time limit).

2. Pending Supplemental Security Income (SSI) or Social Security Disability Income (SSDI) Application

Participants who have applied for SSI or SSDI and who are complying with work activity requirements and/or Alternative Responsibility Plans, but have not yet received a final determination, must be provided an extension of time limits until the participant receives a final determination of the SSI or SSDI application.

- a. A determination of the SSI & SSDI application is considered final once all appeals have been exhausted, benefits have been received, or a denial has been accepted without any appeal.
- b. Participants who apply for SSI/SSDI after they have used their episodic 24/60 or 36/72 time limit or who apply after being sanctioned may apply for a hardship extension and be re-approved for benefits when they provide documentation of their pending SSI or SSDI application.

- c. While awaiting a final determination of their SSI or SSDI application, the participant must comply with the Alternative Responsibility Plan. Assigned activities will be based on the participant's medical ability to comply. If a final determination results in the denial of SSI or SSDI benefits, any period during which the participant received TCA shall count against their 48-month lifetime limit.
- d. Time limits may extend beyond 48-month Florida lifetime limit for participants with SSI or SSDI applications pending.

3. Domestic Violence

Victims of domestic violence may be granted a hardship extension if the effects of domestic violence delay, interrupt, or adversely affect the individual's participation in CAP.

E. Hardship Extension Compliance Requirement

Individuals who are on a hardship extension are required to comply with their IRP or their ARP. Failure to comply without good cause reasons would result in pre-penalty counseling and may result in a sanction. If sanctioned, the TCA will close, and the remaining extension months (if any) will be voided. The standard pre-penalty and sanctioning procedures are to be followed. (If the participant applies for TCA in the future, they would need to reapply for a hardship extension). Upon receipt of the sanction request, DCF will close the TCA with the appropriate level sanction code (433/434/435) and with code 162 (extension ended).

F. Hardship Extension Denials

If a hardship extension is denied, DCF staff will refer the case to the Office of Family Safety and Preservation to determine if the child (ren) is/are at risk of being removed from the home and placed in emergency shelter or foster care when the family reaches the end of the time limit. If so, benefits will be paid through a protective payee.

G. CAP on Hardship Extensions

CSSF may grant hardship extensions for up to 20 percent of the average monthly TCA regional caseload based on their current criteria for determining hardship extensions. Some of these hardship extensions may be extensions beyond the 48-month lifetime limit. Extensions beyond the life time limit should be approved based on established guidelines. CSSF is responsible for tracking the number of participants receiving hardship extensions to ensure they do not exceed 20% limit.

Note: If a participant has been granted a hardship extension, is in compliance with work activities or Alternative Responsibility Plan, has months remaining on the extension, and relocates to another region, the participant's case would be transferred to the new region. The participant would continue to receive TCA and be able to use the remaining months of the hardship extension. The hardship extension would apply to the new region's 20% cap on hardship extensions. As appropriate, the receiving AJC staff may revise the IRP/ARP to conform to local practices.

Forms Attached

[Hardship Extension Appointment Letter](#)

[CF-ES 2082-Hardship Extension Review Form](#)

[SSI/SSDI Time Limit Extension Review Form](#)

[Hardship Extension Statement of Understanding](#)