

Date of Issue: June 21, 2004
Office of Issue: AWI FG 04-013
Reference: Welfare Transition Up-Front Diversion

## Final Guidance Welfare Transition Up-Front Diversion Program

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### **Of Interest To:**

Workforce Florida, Inc., all Regional Workforce Boards (RWB), and other entities engaged in implementing programs under the Temporary Assistance to Needy Families (TANF) program and the Welfare Transition (WT) program.

### **Subject:**

Revised Guidance on Up-Front Diversion including clarification regarding eligibility requirements and Transitional Childcare (TCC) data reporting requirements.

### **Background:**

The 2000 Florida Legislature made several changes to the Up-Front Diversion program. The Up-Front Diversion program is **available only to applicants** as an **alternative** to ongoing Temporary Cash Assistance (TCA), Florida Statute 445.017.

### **Program Guidance:**

Individuals apply for TCA for many reasons including assistance for recurring needs such as shelter, utility payments, food and monthly expenses. Some applicants do not need ongoing cash assistance to meet recurring needs as they may be facing unexpected circumstances and/or emergency situations. The applicant may need immediate aid to secure or retain employment or child support rather than require ongoing assistance. The immediate needs may include unexpected shelter or utility payments, car repairs to continue employment or need other services to alleviate the emergency and allow the person to secure or retain employment. These immediate needs may be met through Up-Front Diversion.

**Up-Front Diversion shall involve a four-step process by the RWB provider that includes:**

- Step 1**      **Linking applicants with job opportunities as a *first option*;**
- Step 2**      **Offering services, such as childcare or transportation, as an alternative to welfare;**
- Step 3**      **Screening applicants to respond to the emergency needs of the family;**
- Step 4**      **Offering a ONCE IN A LIFETIME payment of up to \$1000 per family.**

## I. Initiating the Process

Three different methods of initiating this process have been observed:

- The individual may have submitted a Request for Assistance (RFA) through the Department of Children and Families (DCF). The DCF Economic Self-Sufficiency Specialist (ESS) will explain Up-Front Diversion to the applicant. If the applicant is interested and the ESS determines the applicant is potentially eligible for TCA and the diversion, the applicant will be referred to the RWB provider to complete the Up-Front Diversion process and initiate the WT Work Registration Process.
- The individual has submitted an application for TCA. During the application and WT Work Registration process, the RWB provider may find the applicant to be a potential candidate for Up-Front Diversion. Because the applicant may not require on-going recurring TCA, the applicant can be reviewed as a potential candidate for the Up-Front Diversion.
- An individual who has not applied for TCA may go to the local One-Stop Career Center and express interest regarding emergency assistance or an Up-Front Diversion payment.

Regardless of the original point of contact, the applicant must submit a RFA to the local DCF office. The applicant will be referred to the RWB provider who should utilize the Up-Front Diversion Screening form, AWI WTP-2073A, to determine the potential candidacy of the TCA applicant. By reviewing this information, the RWB provider can determine if the applicant would be more appropriately served with diversion services or an Up-Front Diversion payment. If the applicant appears to be a potential candidate, the RWB provider should proceed with the Up-Front Diversion eligibility determination process, linking the applicant to employment opportunities and job services.

## II. Determining Eligibility

Determining a person eligible includes screening the individual to ensure:

1. The individual documents his or her identity;
2. The individual provides information regarding household composition, diversion eligibility, and TANF eligibility;
3. The individual is an applicant and is not currently receiving TCA;
4. The applicant has **an emergency/unexpected situation** that may be resolved through Up-Front Diversion; and
5. The applicant has **secured an on-going means for meeting monthly recurring expenses**.

### **III. The Regional Workforce Board (RWB) Responsibility**

The RWB provider is responsible for the approval or denial of a family for receipt of Up-Front Diversion payment and provision of services. Therefore, the provider is responsible for the following:

1. Determining the applicant for TCA eligible for the Up-Front Diversion provision of services and/or payment.
  - Document the identity of the TCA applicant. The applicant must provide readily acceptable documentation of identity, such as work or school ID cards, State ID card, driver's license, voter's registration cards or birth certificates.
  - Document the household composition. A self-attestation is allowable. FLORIDA screens may also be used to document the household's composition. If the FLORIDA screens are utilized to document household composition or other eligibility factors, the screens should be printed and placed in the hard file in the event of a review.
  - Verify the applicant has a child(ren) under age 19 residing in the home or is a pregnant woman and meets TCA eligibility criteria (for pregnancy criteria, see F.S. 414.095 (6));
  - A Social Security Number (SSN) is required for the TCA applicant interested in diversion, or the TCA applicant must apply for a SSN with the Social Security Administration. A SSN must be provided for each family member applicable to eligibility. For example, the applicant should provide the SSN for the children applicable to the case. If the applicant has been on TCA in the past, the household members' SSN numbers should already be documented in the system. The RWB provider should assist the applicant if (s)he needs help applying for a SSN.
  - Document the citizenship or qualified non-citizenship status of the individual requesting diversion. If the individual is a qualified non-citizen, verification is required as indicated on the TANF Eligibility Form, AWI 0005.
  - Document the household income and resources. Income is defined as income on the date of application. Self-attestations are acceptable forms of verification: and the information provided on FLORIDA is acceptable.
  - Verify the participant has not exhausted his or her TCA time limit. If the applicant does not qualify for or receive TCA or is not "potentially eligible" for TCA due to exhausting his or her time limits, the applicant is not eligible to receive Up-Front Diversion.
  
2. Verifying and documenting that the family has an unexpected or emergency situation. Emergencies may include:
  - Catching up on utility bills to avoid an interruption in services;
  - Car repairs;
  - Emergency payment for counseling;
  - Replacement of lost income due to medical leave without pay;
  - Emergency childcare payment (not parent fees) for temporary childcare while securing permanent childcare; and/or
  - A need for tools, clothing, shoes or equipment necessary for employment.

3. Determining what the family would need to resolve the emergency situation. Resolving the emergency would prevent the family from requiring ongoing TCA. Tools to determine and resolve the emergency may include:
  - The family plan to resolve the emergency situation; and
  - A budget for meeting future expenses or reducing the likelihood of other emergency situations.
4. Determining and verifying the applicant has or has not demonstrated a need for diversion and the Up-Front Diversion would eliminate a need for on-going TCA;
5. Determining the services that should be provided to the applicant through the WT Work Registration process and the Up-Front Diversion process;
6. Providing the applicant with referrals for community support services as deemed appropriate;
7. Notifying the ESS of the RWB decision; and
8. Notifying the applicant through the Agreement for Up-Front Diversion Payment/Service (AWI WTP-2075), of
  - TCC;
  - The restriction on applying for cash assistance for three months after the receipt of the Up-Front Diversion payment unless an acceptable emergency is demonstrated to the RWB; and
  - Repayment of Up-Front Diversion payment. If the participant is approved of an emergency re-application by the RWB after the receipt of the Up-Front Diversion payment prior to the three-month restriction the family must repay the diversion amount.

#### **IV. The Up-Front Diversion Process**

The individual must apply for TCA and complete the pre-screening process for Up-Front Diversion<sup>1</sup> through the local DCF office. The ESS from the district DCF office will send a copy of the Request for Assistance (RFA), CF-ES 2066, as a referral to the RWB during the application and WT Work Registration process **if** the applicant indicates interest regarding Up-Front Diversion to DCF. The TCA prescreening completed by DCF is an initial determination that the applicant is potentially eligible for TCA. The prescreening is completed in an expedited fashion to ensure the applicant is connected with the appropriate services and assistance **if** the applicant indicates (s)he is interested in Up-Front Diversion. The applicant is referred to the RWB by the ESS to begin the WT Work Registration Process and to be reviewed for Up-Front Diversion eligibility.

1. The applicant should be referred to the RWB provider to begin the WT Work Registration process. Through the registration process,

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<sup>1</sup> Florida Administrative Code 65A-4.212 Up-Front Diversion

- The applicant should be engaged in a work activity<sup>2</sup>;
- If the applicant expresses interest in the diversion program instead of on-going TCA, the applicant must be screened and meet the eligibility criteria for TCA and for Up-Front Diversion. The RWB provider and the applicant should also review the AWI WTP-2073A, Up-Front Diversion Screening Form. **The date the Up-Front Diversion Screening Form is completed (the date is indicated on the bottom of form AWI WTP-2073A) is the official date the Up-Front Diversion process begins.**
- If the Eligibility for Diversion Services Screening Tool, AWI WTP-2073B, was not completed by the ESS, the RWB provider should complete the form to document the potential eligibility of the applicant. The RWB must review the information with the applicant to ensure that the applicant is a **good candidate** for Up-Front Diversion.
- **The first step of the diversion process should be to link the applicant with employment opportunities.** If the applicant has secured employment, provided documentation and has been determined eligible for diversion services, the appropriate services should be provided to ensure the applicant begins work and retains the employment. If the applicant has not secured employment, the applicant should begin the process of referral to employment opportunities and diligent job search as defined by the RWB.

**2. The second step of the Up-Front Diversion process is to link applicants to support services.** Support services should be provided so the applicant can:

- Participate in a diligent job search;
- Make contact with the employment opportunities provided by the RWB provider;
- Initiate the WT Work Registration process; and
- Be diverted from on going cash assistance.

**Services: Applicant Services versus Up-Front Diversion as a Provision of Services.**

An applicant who is being considered for Up-Front Diversion *may or may not* require a cash payment of **up to** \$1000.00 to divert the family from receiving recurring TCA. (S)he may need a basic support service to secure employment, secure child support or overcome an emergency. There are different categories of support services:

- The TCA applicant can be provided with applicant support services to assist the applicant with job search activities, obtaining employment, initiating the WT Work Registration process and/or retaining employment;
- The applicant may be provided with Up-Front diversion provision of services as an alternative to TCA.

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<sup>2</sup> Florida Statute Chapter 414.095 Determining eligibility for temporary cash assistance

Individuals who are provided with Up-Front Diversion as a provision of services are provided with short term, non-recurrent services (**defined as no more than four months**). The Up-Front Diversion provision of services is paid for by utilizing local RWB TANF funds. The services are not provided through the traditional Welfare Transition “means” of assistance. For example, the individual needs four months of childcare to secure the employment (s)he as been offered. Four months goes beyond the time period allowed for the RWB to provide applicant childcare. The RWB provider pays for childcare directly through the RWB determined process. In this example, the RWB provider did not provide a Welfare Transition (applicant or transitional) childcare referral. Support services that are approved as a diversion to on-going cash assistance through local TANF dollars are considered “non-assistance” because the services are provided for a short time period and are addressing an emergency need. These services are considered “diversion services” not applicant services. The provision of services as Up-Front Diversion must be recorded under the *Service Plan* portion of the *Skill Development* screen in the OSST system.

*Applicant support services* are short-term benefits to assist the TCA applicant with completing the TCA application process and obtaining or retaining employment. Applicant support services may include transportation assistance and childcare. Applicant support services should not exceed 30 days due to the DCF’s time standard to approve or deny a TCA application. Applicant childcare may be provided through the WT childcare referral process.

**Childcare for applicants of Up-Front Diversion should be provided for 30 days from the date the Up-Front Diversion process officially started.** As indicated earlier in the guidance paper, the official start date should be documented on the Up-Front Diversion Screening Form, AWI WTP-2073A. If the applicant receives an Up-Front Diversion payment or provision of services, (s)he must secure employment to receive TCC.

### 3. Process Outcome

**a. Approval of the Monetary Benefit and/or Provision of Services:** Once the applicant has verified eligibility, demonstrated an emergency need and demonstrated the ability to meet on-going economic needs, a one-time payment of **up to \$1000** per family and/or a provision of services utilizing local TANF funds for up to four months may be offered. The AWI WTP-2075 should be completed with the participant and the RWB provider. The AWI WTP-2075 must be forwarded to DCF and a copy retained in the case file. Recognizing that Up-Front Diversion is designed to help families cope with emergencies, Up-Front Diversion **payments should be authorized by DCF within five working days after receiving the authorization from the RWB provider.**

The Agreement for Up-Front Diversion Payment/Service must be signed by the participant indicating that (s)he:

- Understands the amount (s)he is potentially eligible for;

- Understands that the family is declining to receive TCA for three months once the Up-Front Diversion payment is received;
- Understands (s)he may apply for Medicaid or food stamps anytime in the future<sup>3</sup>;
- Understands the Up-Front Diversion payment **up to** \$1,000 is a **once in a lifetime benefit**;
- Understands (s)he may be eligible to receive TCC if (s)he is employed within 90 days of the start of the diversion process and the family's income does not exceed 200 percent of the [Federal Poverty Level](#); and
- Understands that if the application for diversion is denied or the applicant chooses not to receive the Up-Front Diversion payment, the TCA application will be processed by DCF.

**b. Denial of the Monetary Benefit and/or Provision of Services:** if the participant does not meet the diversion criteria, eligibility or the RWB provider determines that an Up-Front Diversion payment or provision of services is not appropriate, the Up-Front Diversion should be denied. The AWI WTP-2075 should be completed and marked DENIED in section C. The RWB provider must sign the AWI WTP-2075. The AWI WTP-2075 and the Request for Assistance must be forwarded to DCF and a copy retained in the case file. **If the applicant is not approved for Up-Front Diversion, the ESS will complete the TCA application at that time. The applicant should complete the WT Work Registration Process through the RWB provider.**

## **V. Transitional Childcare**

Based on Florida Statute 445.032, individuals who are re-directed from cash assistance through Up-Front Diversion payment and/or provision of services may be eligible for TCC. Transitional Childcare eligibility requirements for Up-Front Diversion recipients have been limited. The applicant must be employed within 90 days after the date the Up-Front Diversion process started.

- The Up-Front Diversion applicant should be given a 30-day referral for applicant childcare. The start date of the referral should be the date the Up-Front Diversion process began.
- If the applicant has not obtained employment when the 30-day childcare expires, (s)he is responsible for his or her own childcare needs for the remainder of the 90-day time period.
- The applicant must secure employment prior to receiving TCC from the RWB provider or the DCF ESS. The employment must be secured within 90 days of the date the Up-Front Diversion process was started.

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<sup>3</sup> Florida Statute Chapter 445.029 Transitional Medical Benefits

- If employment is not secured within the 90-day timeframe, (s)he is not eligible for TCC.

Other provisions of TCC still apply. If the applicant secures employment within the 90-day time period and subsequently loses employment, (s)he is still eligible to receive the 30-day job search TCC available to other transitional participants. See the [Transitional Childcare Guidance Paper](#).

## **VI. Sanctioned WT Participants**

During the screening process, a determination should be made whether the family applying for Up-front Diversion is currently sanctioned. Sanctioned families, including families receiving TCA through a Protective Payee, are not eligible for Up-Front Diversion. Families with a current level two or three sanction in place must serve out the minimum sanction period and then comply to have the sanction lifted before requesting Up-Front Diversion. Once the participant has complied to lift the sanction, (s)he must complete the application process with the Department of Children and Families. The Up-Front Diversion process must be completed prior to the approval and issuance of TCA benefits.

## **VII. Emergency Application for Temporary Cash Assistance**

If a recipient of Up-Front Diversion requests assistance from DCF prior to the three-month restriction period ending, (s)he must demonstrate an emergency need to the RWB provider to be approved for TCA. According to DCF, the three-month restriction includes the month in which the diversion payment was received.

1. The individual must be referred to the RWB to complete the Diversion Services Emergency Criteria form, AWI WTP-0001.
2. If the RWB provider determines the family has demonstrated a qualified emergency within the three-month period, including the month of the cash payment, the family is allowed to reapply for TCA. The diversion payment must be prorated over an 8-month period and deducted from any temporary assistance for which the family is eligible.
3. The completed AWI WTP-0001 must be forwarded to DCF. The AWI WTP-0001 notifies DCF staff if the individual is eligible to reapply for TCA.

Emergency Reasons May Include:

- Hospitalization or illness resulting in a significant loss of income or employment;
- Loss of housing
- Natural disaster responsible for destruction of the family's major property; or
- Other situations of similar nature affecting employment.



## **VIII. Other Significant Information**

- Up-Front Diversion payment and/or services will not count against the client's time limit for receiving TCA.
- Individuals receiving cash payments for Up-Front Diversion are considered as applicants and have no effect on the Welfare Transition Entered Employment Rate.

## **IX. Data Entry in the OSST System**

Up-Front Diversion assistance information is compiled from OSST on a regular basis and compared to the information recorded in the FLORIDA system. Data regarding WT applicants served is also compiled and reported from the OSST system on a regular basis.

- For applicants who are former WT participants, the case information should be updated and the WT Work Registration process should be initiated.
- Work activities assigned during the WT Work Registration process should be recorded in OSST.
- Supportive services received during the WT Work Registration process should be recorded in OSST.
- **The RWB provider must record the Up-Front Diversion process in the OSST system. The Up-Front Diversion payment must be recorded under Service Plan on the Skill Development screen as Up-Front Diversion service. An Actual Start Date should be entered to indicate the date of the request for Up-Front Diversion services.**
- The *Up-Front Diversion* service must be closed appropriately in OSST by entering an *Actual End Date* when the service is approved or denied. If the applicant receives the service or benefit, the *Reason for Outcome* should be *Completed*.
- At the entry of the service outcome, the financial outcome must be entered. The two options available under the *Financial Outcome* section are, "was the applicant provided with RWB funded Up-Front Diversion as a service," and "was the applicant provided with Up Front Diversion payment of up to \$1000 through the Department of Children and Families on the electronic benefit card (EBT)?" A selection of *yes* or *no* must be selected for each question for the data to be saved.
- If an outcome is entered on an OSST case in "mandatory" status, a warning will appear. Diversions are not applicable to mandatory cases. The individual must be a TCA applicant.

- A *Case Note* must be entered at each phase of the diversion process. A *Case Note* should be entered regarding the reason for qualification (emergency or unexpected need), the supervised job search, the completion of the agreement and Up-Front Diversion forms, as well as Up-Front Diversion payment amount and/or services rendered.

## **X. Forms**

The Up-Front Diversion forms are available on the AWI [Welfare Transition](#) website.

Diversion Services Emergency Criteria form	AWI WTP-0001
Diversion Services Eligibility Screening Tool	AWI WTP-2073B
Up-Front Diversion Agreement for Payment/Service	AWI-WTP 2075
Up-Front Diversion Screening Form	AWI WTP-2073A

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