



## TANF 706-1 Employment and Training Activities

**Supersedes:** TANF 706-1 (10/1/2021)

**Reference:** ARM 37.78.102, .103, .801, .806., .807, .810, .811, .812 and .826; MCA 53-4-209; CFR 261.30 - .36, Deficit Reduction Act of 2005

**Overview:** Employment and Training (E&T) activities are intended to allow families to become stable, able to work, and financially secure. As a condition of eligibility, Work Eligible individuals who are included in the assistance unit and referred to Pathways must participate in Pathway's employment and training activities for a required number of hours per week. TANF Cash Work eligible clients and Pathways Non-Cash clients must negotiate, sign and comply with the activities negotiated under their Employability/Service Plan.

Allowable activities must comply with all limitations and special rules. Some activities have time-limits or other restrictions. Limits and restrictions are noted in this policy.

Activities are considered either primary or secondary. Clients not participating in the Introductory period, Specialized Services or Short-Term barrier must negotiate Federal Primary or Secondary hours as outlined in TANF 705-1.

### **BRIDGE CATEGORY - EMPLOYABILITY ACTIVITIES:**

#### **ASSESSMENT:**

An individual's suitability for an activity may be assessed with the activities listed below. The assessment activities are designed to be completed prior to the actual activities.

- Subsidized or Unsubsidized Employment
- Work Experience
- Community Service Programs (CSP)
- Job Search/Job Readiness
- Job Skills Training Directly Related to employment
- Vocational Education/Specialized Training
- Education directly related to employment
- Satisfactory attendance at a secondary education program/HiSET
- Assessment Non-Cash

Assessment activities may include, but are not limited to:

- Interest inventory
- Computer skills
- Typing tests
- Work place expectations (i.e. dress code, behavior on the job, etc.)
- Phone skills
- Career counseling
- Literacy classes (computer literacy, financial literacy, etc.)
- Developing a calendar
- Life skills training (decision making, organization, healthy nutrition, advocacy, relationships, problem solving, etc.)
- Soft skills training (business etiquette, customer service, interpersonal communication, etc.)
- Mandated AA meetings (documentation required)
- Substance abuse treatment, mental health treatment or medical rehabilitation activities as determined necessary by a qualified medical or mental health professional.
- Career assessments, TABE test, etc.

Assessment may be a federally countable primary or secondary activity depending on the activity being assessed. Time limits apply to the following assessment activities:

- Job Search/Job Readiness assessment hours are counted in the total allowable hours listed in this policy section under Job Search/Job Readiness Assistance.
- Vocational Education/Specialized Training assessment months are counted in the total allowable months listed in this policy section under Vocational Education/Specialized Training.

#### **EMPLOYMENT (UNSUBSIDIZED OR SUBSIDIZED):**

Employment can be full-time, part-time or self-employment and may be subsidized (private or public) or unsubsidized.

Hours for any client engaged in paid employment must be negotiated as an activity and reconciled.

Employment is a federally countable primary activity with no time-limit restrictions.

#### **WORK EXPERIENCE (WEX):**

Work Experience (WEX) is formal job experience and training at an employer's site. WEX placements should be used to develop or enhance the client's basic work habits and/or improve their specific work skills.

WEX placements are limited to no more than 8 hours per day and 40 hours per week. Placement sites may be in the private, public or governmental sector.

A formal, signed agreement between the Employment and Training contractor and the employer (sponsor) is required prior to the start of each WEX placement.

WEX is a federally countable primary activity with no time-limit restrictions.

Other WEX requirements/conditions include:

- TANF cash must be approved and authorized prior to starting WEX.
- Detailed training plan.

For additional placement requirements see TANF 707-1.

### **COMMUNITY SERVICE PLACEMENT (CSP):**

Community Service is a structured program where TANF clients perform work that directly benefits the community under auspices of public or non-profit organizations. It is the client's responsibility to make arrangements to volunteer at the agency. Clients must:

- Get the volunteer site approved through the Pathways agency, and
- complete the required "Site Agreement" (HCS-775), and
- Complete weekly timesheets.

Community Service Placements are limited to no more than 8 hours per day and/or 40 hours per week.

CSP is a federally countable primary activity with no federal time-limit restrictions, however, TANF clients are limited to 3 months at the same Community Service Placement site. Supervisor approval is needed to extend the site agreement past the 3 months.

### **JOB SEARCH/ JOB READINESS ASSISTANCE:**

Job Search/Job Readiness includes looking for/gaining employment, job search preparation (including life skills training), substance abuse and mental health treatment or rehabilitation activities. A qualified medical, substance abuse or mental health professional must determine and document the necessity for treatment/therapy. These activities must be coded in CHIMES under one of the following categories:

1. Job Search/Job Readiness
2. Job Search/Job Readiness – Financial Literacy
3. Job Search/Job Readiness – Therapy/Treatment

Job Search/Job Readiness is a federally countable primary activity and is restricted as listed below:

1. Limited to 4 consecutive weeks with no more than 12 weeks in a year.
  - a. No job search/job readiness activity can count for one week immediately following four consecutive weeks.
2. The 12 weeks in a year is measured on an hourly basis:
  - a. 240 hours for a single parent with a child under 6;
  - b. 360 hours for all other work- eligible clients;

- c. Hourly limitations are applied to the preceding 12-month period (the reporting month and previous 11 months).

**JOB SKILLS TRAINING DIRECTLY RELATED TO EMPLOYMENT:**

Job Skills Training or education that provides the skills required for the individual to obtain, retain or advance their employment, or to adapt to changing workplace demands.

Job Skills Training is a federally countable secondary activity with no time limit restrictions.

**VOCATIONAL EDUCATIONAL TRAINING:**

Vocational Educational Training must be directly related to preparing clients for work in current or emerging occupations. This can be any organized educational or training program beyond a high school diploma.

Vocational Educational Training is a federally countable primary activity and is limited to no more than 12 months in a lifetime.

Other Conditions:

- Clients may negotiate supervised study time equal to the number of class/credit hours.
- Clients may negotiate unsupervised study time to equal every hour of class time.

College Block Schedules

- Clients attending colleges who run the block schedule may meet full time status, but the number of credits must be looked at to determine the actual number of credits the client is enrolled in at that specific time. If the client is taking 12 credits over the 16-week semester, but due to the block schedule, is taking 6 credits/hours then only 6 hours of unsupervised study time and 6 hours of supervised study time are allowed.

Online post-secondary courses are countable if the credits earned are transferrable in their entirety to the Montana University System.

- The number of semester credits must be comparable to the number that defines a full-time post-secondary student in Montana.
- Proof that the online college is accredited.

Montana's criteria for "progress" will be based on the academic criteria as set forth by the educational institution the client is attending necessary to achieve completion of the course, or to be allowed to continue in the course. This progress will be documented in the case file by grade records or a report from the educational institution or instructor. If the class instructor indicates the client is not making progress, this will be considered sufficient evidence for failing to make "progress."

**EDUCATION DIRECTLY RELATED TO EMPLOYMENT:**

Education related to a specific occupation, job or job offer for clients who do not have either a high school diploma or equivalent. This may include courses designed to provide the knowledge skills for a specific occupation or work settings but may also include adult basic education and English as a second language (ESL) or required as a prerequisite for employment for employers or occupations. This activity may also include High School Equivalency. This activity must be supervised on an ongoing basis and no less frequently than once each day.

Unmarried teen parents, with a minor child at least 12 weeks of age in his or her care, without a diploma or HSED (High School Equivalency Diploma) must participate in educational activities directed toward the attainment of a high school diploma or HSED or an alternative educational or training program approved by the state. Alternative educational or training programs must have prior approval from Central Office. Teen parents may participate in the Birth of Baby activity.

This educational activity is federally countable and a federal primary activity for clients under age 20. This activity is a federal secondary activity for clients age 20 or older.

These hours can include:

- Class time in a high school or alternative high school
- Attending HiSET preparation courses
- Supervised study time
- Unsupervised study time to equal every hour of class time
- Basic and remedial education to provide participant with brush up skills needed for employment

The actual hours of participation in this activity will be based on one or a combination of the following:

- Class attendance records
- Report from class instructor verifying hours of participation
- Timesheets signed by instructor
- Completed assessment activities along with a daily log of time spent on these activities

There are no time-limit restrictions for this activity, but it does count toward the Federal 30% cap on clients participating in educational activities.

Montana's criteria for "progress" will be based on the academic criteria as set forth by the educational institution the client is attending necessary to achieve completion of the course, or to be allowed to continue in the course. This progress will be documented in the case file by grade records or a report from the educational institution or instructor. If the class instructor indicates the client is not making progress, this will be considered sufficient evidence for failing to make "progress."

**SATISFACTORY ATTENDANCE AT A SECONDARY EDUCATIONAL PROGRAM/HISET:**

Satisfactory Attendance at A Secondary Educational Program/HiSET is allowed only for clients without a high school diploma or equivalent. This activity must be supervised on an ongoing basis and no less frequently than once each day.

Unmarried teen parents, with a minor child at least 12 weeks of age in his or her care, without a diploma or HSED (High School Equivalency Diploma) must participate in educational activities directed toward the attainment of a high school diploma or HSED or an alternative educational or training program approved by the state. Alternative educational or training programs must have prior approval from Central Office. Teen parents may participate in the Birth of Baby activity.

This educational activity is federally countable and a primary activity for clients under age 20. This activity is a secondary activity for clients age 20 or older.

These hours can include one or a combination of the following:

- Class time in a high school or alternative high school
- Attending HiSET preparation courses
- Supervised study time
- Unsupervised study time to equal every hour of class time
- Basic and remedial education to provide participant with brush up skills needed for employment

The actual hours of participation in this activity will be based on one or a combination of the following:

- Class attendance records
- Report from class instructor verifying hours of participation
- Timesheets signed by instructor
- Completed assessment activities along with a daily log of time spent on these activities

There are no time-limit restrictions for this activity, but it does count toward the Federal 30% cap on clients participating in educational activities.

Montana's criteria for "progress" will be based on the academic criteria as set forth by the educational institution the client is attending necessary to achieve completion of the course, or to be allowed to continue in the course. This progress will be documented in the case file by grade records or a report from the educational institution or instructor. If the class instructor indicates the client is not making progress, this will be considered sufficient evidence for failing to make "progress."

### **PARENTS AS SCHOLARS (PAS):**

Parents As Scholars allows some TANF Cash recipients to continue full-time post-secondary education beyond the Federal 12-month limit, or to participate in full-time classes to obtain a High School diploma or equivalent. PAS participation is limited to 25 slots statewide; slots are awarded through an application process and regional lottery.

PAS is a State of Montana activity and is not considered a federal countable activity. At state option, Montana elected to provide this activity to assist clients in continuing their education.

PAS clients are not subject to the 30% educational activity cap.

A TANF client is eligible to participate in the PAS if the client:

1. Meets all TANF basic eligibility requirements and be receiving TANF cash;
2. Is a full-time student (as defined by the educational institution);
  - a. Post-secondary education; or
  - b. High school, High School Equivalency Test (HiSET) or vocational training.
  - c. Is enrolled in an:
    - i. approved educational program in the Montana university system, community college, tribal college, private college or other accredited college in Montana with the goal of obtaining an associate's or bachelor's degree, or
    - ii. Online post-secondary courses are countable if the credits earned are transferrable in their entirety to the Montana university system.
      1. The number of semester credits must be comparable to the number that defines a full-time post-secondary student in Montana.
      2. Proof that the online college is accredited.
    - iii. College Block Schedules  
Clients attending colleges who run the block schedule may meet full time status, but the number of credits must be looked at to determine the actual number of credits the client is enrolled in at that specific time. If the client is taking 12 credits over the 16-week semester, but due to the block schedule, is taking 6 credits/hours then only 6 hours of unsupervised study time and 6 hours of supervised study time are allowed.
3. Accredited high school or training program approved by the department; and
4. Has exhausted 12 months of Vocational Educational Training while receiving TANF and be in good standing with the educational program.
  - a. This requirement does not apply to High school and HiSET clients.

Once approved, to retain their PAS slot, the student must continue to be enrolled in an approved educational program or online curriculum, meet all basic TANF requirements and meet the following:

1. Maintain a cumulative 2.0 GPA on a 4.0 scale or be making satisfactory progress (as defined by the institution);
  - a. PAS matches financial aid rules regarding GPA and academic probation. The student must verify:
    - i. Current GPA (at the semester end); and
    - ii. Class registration for the next semester with a minimum of 12 credits.
2. Ensure course work will lead to a certificate or degree in an approved program;

3. Not have a bachelor's degree or current certificate in a field in which they've already received a degree or certificate;
4. Maintain monthly face-to-face contact with the E&T case manager and school counselor throughout PAS participation. This is necessary to ensure ongoing case management, E/SP compliance and satisfactory progress in their comprehensive plan; and
5. Develop a plan for study course completion and attainment of a degree or certificate, regardless of the number of TANF months remaining on their TANF time clock.

When a TANF cash client is approved for PAS participation and is granted a slot, the slot is retained during school breaks (Spring, Summer, etc.) if the client continues to participate in negotiated work activities per their current E/SP. Alternate activities must be negotiated during school breaks to ensure weekly participation hours are met.

If the client's TANF cash case is closed due to sanction, their slot is forfeited.

#### **TANF NON-CASH ACTIVITIES:**

TANF Non-Cash activities in CHIMES are only available to clients participating in Pathways TANF services. TANF Non-Cash clients must meet all financial and non-financial criteria including being a member of the assistance unit.

Clients participating in TANF Non-Cash services are not subject to activity time limits, hourly requirements or exemption criteria. Non-Cash clients are not subject to the 30% educational cap.

1. 'Assessment-Non-TANF Cash' is used for any assessment activity relating to Education, Employment and Financial Literacy.
2. 'Employment-Non-TANF Cash-Working Less than 30 hours' is used when client's employment hours are under 30 hours per week.
3. 'Employment' (subsidized or unsubsidized) is used when client's employment hours are 30 hours per week or more. When 'Employment' is selected, the Work Pays incentive is also issued.
4. Education Non-Cash is used for any Non-Cash client participating in educational activities.
5. 'Financial Literacy Non-TANF Cash' is used for any Non-Cash client financial literacy activities.

See TANF 706-2 Pathways Services

#### **BRIDGE CATEGORY- FAMILY STABILITY**

##### **NEEDED IN HOME (NIH):**

Needed In Home may be used when an adult TANF client is needed to care for a disabled child or disabled family member (of any age, but within the 5th degree of kinship) who lives in the client's home.



Disability may be temporary or permanent. Clients in this activity are not considered “work-eligible” and are not required to participate in additional work activities; however, the TANF client is encouraged to participate in the treatment and/or therapies for the disabled child or family member that are recommended by the qualified medical professional.

Before this activity can be allowed, the HCS-205 (Request for Needed in the Home) form must be fully completed by a qualified medical professional licensed in Montana who is currently involved in the disabled individual’s treatment. The completed form must indicate the TANF client is needed in the home to provide care for the disabled individual.

This medical documentation must be renewed every six (6) months.

Universal engagement is voluntary for clients needed in the home to care for a disabled family member, even if the disabled member is enrolled in school full-time.

Needed in the home is a federally disregarded activity that has no time limit restrictions.

**BIRTH OF BABY (BOB) ACTIVITY and NEW PARENT ACTIVITY (NPA):**

Birth of Baby (single parent households) and New Parent (two-parent households) are allowable activities when a newborn child enters a TANF household and are allowable beginning with the baby’s date of birth and can continue for three (3) full months following the birth month. The TANF client must report the birth or adoption of the newborn within 10 days from the date of birth or adoption for the newborn to be added the month of birth. Failure to report in 10 days, without good cause, will result in the newborn being added the month following the month of birth or report of birth, whichever is later.

Clients in this activity are not required to participate in work activities; however, the TANF client is encouraged to participate in programs for parenting skills and infant care.

The Birth of Baby Activity is federally disregarded and is restricted by state and federal time limits.

The New Parent Activity is a State of Montana TANF activity and is not federally disregarded. Montana elected to provide this activity to assist new parents and is restricted by state time limits.

To qualify for these activities, the:

1. Client must be the newborn’s natural or adoptive parent;
2. Newborn must live with the client;
3. Newborn must be added to the TANF assistance unit;
4. Newborn must be four (4) months old or less for any month this activity is used; and
5. The client has not already exhausted their 12-month maximum lifetime limit for this activity.

**Child Care (No child care available)**

This activity can be used when a TANF client in a single parent household is unable to locate long term child care, through no fault of their own. The following conditions apply:

1. Must be supported by a signed statement from the local Child Care Resource and Referral (R&R) Agency supporting the lack of appropriate long-term child care;
2. There must be a child under the age of six (including the month they turn six) in the household;
3. Must be approved by the Pathways Program Monitor;
4. Must be reviewed every three months by a Supervisor and the Pathways Program Monitor; and
5. The client is required to maintain bi-weekly contact with the Client advocate.

The participant is encouraged to complete activities that are designed to overcome the lack of appropriate child care, including but not limited to:

- Pursuing child care providers and getting on waiting lists.
- Maintaining weekly documented contact with the local Child Care Resource and Referral Agency regarding child care providers.
- Researching employment opportunities in other parts of the state where child care is available.
- Participating in child development/educational activities.

Households who use child care services from anyone, including family members, may not be eligible, depending upon circumstances.

No Child Care available is not a federally disregarded activity. Clients must engage in full hours which may include home based and online learning activities leading to self-sufficiency. Clients cannot be sanctioned for failing to participate when they are unable to locate long term child care, through no fault of their own.

### **Family Stability Activities**

Family Stability Activities listed below are to assist families in overcoming barriers that may prevent them from achieving stability, working and being financially secure. These activities must support the Montana Family Bridge Model.

Family Stability Activities are a State of Montana TANF activity and are not considered a federal countable activity. At state option, Montana elected to provide Family Stability Activities to assist clients with barrier reduction.

The use of Family Stability Activities on an Employability/Service Plan (E/SP) is limited to the following:

- Introductory Period: See TANF 701-2
- Specialized Services – outlined below

- Short-term Barrier: On a case by case basis, clients who experience a crisis which is outside of the clients control after the introductory period, may negotiate Family Stability Activities or a combination of Family Stability Activities, primary and secondary activities up to 2-weeks. Additional intervals may be negotiated on a case by case basis with monitor approval.

Family Stability Activities may be used by a non-cash client in accordance to policy.

Family Stability Activities are:

1. Food
  - a. May include but is not limited to:
    - SNAP – fill out application, interview, provide verifications
    - WIC
    - Food Banks
    - Montana State SNAP-Ed program
    - Nutrition courses
    - Commodities
    - Menu planning/budgeting
2. Housing
  - a. May include but is not limited to:
    - Public Housing
    - Section 8
    - LIEAP
    - Homeless Shelters
    - Transitional Housing
    - Budgeting
    - Obtain mailing address/P.O. Box
    - Working with utility providers
    - Housing inspections
3. Child Education (Child Care Search)
  - a. May include but is not limited to:
    - Head start, elementary school (enrollment)
    - Parenting classes
    - Relationship classes
    - IEP meetings
    - Parent/teacher conferences
    - Complete Working Caretaker Relative application
    - Immunizations
    - Research day care facilities
4. Child Development

- a. May include but is not limited to:
  - Online research on activities to do with child
  - Developmental screenings
  - Developmental milestone inventory
  - Speech Therapy, Physical Therapy, Occupational Therapy
  - Home visiting nurses
  - Parents as Teachers
5. Social Supports
  - a. May include but is not limited to:
    - Relationship classes
    - Develop social circle of family, friends, etc.
    - Grief support groups
    - Diabetes Support group
    - MT Kinship Navigator Program (Grandparents raising grandchildren)
    - Supervised visits with children
    - Multiple Sclerosis support group
    - National Alliance for Mental Illness support group
6. Safety
  - a. May include but is not limited to:
    - Temporary Restraining Order
    - Anger management classes
    - Legal appointments related to safety concerns
    - Child safety seat checks
7. Safety/Domestic Violence
  - a. May Include but is not limited to:
    - DV resource center
    - DV safety plan
    - Advocacy training
    - Counseling
    - Temporary Restraining Order
    - Custody/Parenting Plans
8. Transportation
  - a. May include but is not limited to:
    - Transit/Bus system
    - Driver's License – study, take test & obtain
    - Car insurance
    - Budgeting
    - Vehicle repairs
    - Registration
9. Physical Health

- a. May include but is not limited to:
  - Annual exams
  - Health classes
  - Medical appointments
  - Physical Therapy
  - Medical Assessments
  - SSI applications/process
  - In home exercise plan from physician
  - Researching medical condition
  - Journaling
- 10. Mental health
  - a. May include but is not limited to:
    - Counseling
    - Center for Mental Health
    - SSI applications/process
    - Researching medical condition
    - Journaling
    - Follow treatment plan
    - In patient/outpatient
- 11. Substance Use
  - a. May include but is not limited to:
    - AA/NA
    - Group therapy
    - In patient/Outpatient treatment
    - Counseling
    - Journaling
    - Follow treatment plan
- 12. Specialized Services.

Clients with long term barriers who are unable to participate in any federally countable hours, may negotiate Family Stability Activities beyond the 30 days. This service may be offered to clients whose documentation indicates they cannot participate in federally countable primary and secondary activities.

Clients must provide the following documentation to be approved for Specialized Services:

- HCS-206 (REV 01/19) form to be completed by a qualified medical professional licensed in Montana who is currently involved in the individual's treatment indicating the client is unable to participate.
  - Must be reevaluated at minimum every 6 months; which includes a new HCS-206.

At approval for Specialized Services the client advocate must refer the client for screening through the State or Tribal Vocational Rehabilitation program and to the Social Security Office to apply for Supplemental Security Income (SSI).

To continue in Specialized Services clients must provide:

- A letter from the State or Tribal Vocational Rehabilitation program indicating screening date and results within 6 months of the referral to the Vocational Rehabilitation program. (case note if results are not yet available); and
- Apply for Supplemental Security Income (SSI) and provide a letter from SSI the application has been received within 6 months of the referral to SSI; and
- Provide an updated HCS-206 every 6 months at minimum.

Clients in Specialized Services must negotiate the full 27/33 hours in Family Stability Activities on the E/SP. The E/SP description may reflect reduced hours based on the client's ability to participate and may be vague. Activity hours completed must be reconciled with FSA timesheet.

- Accommodated Hours: Clients needing accommodated hours must negotiate full hours of participation (27/33 per week) and can use a combination of Federally allowable and Family Stability Activities. Federal hours can be any combination of primary and secondary hours.

Clients must provide the following documentation for accommodated hours:

- HCS-206 (REV 01/19) form to be completed by a qualified medical professional licensed in Montana who is currently involved in the individual's treatment.
  - Must be reevaluated at minimum every 3 months, which includes a new HCS-206.

Activities may include Life skills, treatment plans, journaling, applying for SSI, etc.

### **OTHER ACTIVITIES**

#### **FAIR HEARING PENDING (FHP):**

Fair Hearing Pending is only used when a TANF client requests a fair hearing with continued benefits during a sanction penalty month or ineligibility period.

Pathways will use this activity in CHIMES when a client requests a fair hearing with continued benefits and a referral from the Fair Hearings Unit has been received. FHP activity is time-limited for sanction hearings. See TANF 1506-5

### **HOURS NOT COMPLETED:**

Hours Not Completed can only be used for hours in the application month prior to the employability/service plan being negotiated. If allowable work activities can be reconstructed, the appropriate activity(ies) are listed instead of Hours Not Completed.

Hours Not Completed is limited to the application month and the following month and can only be used in the second month if engagement with the E&T program does not occur in the application month.

### **RE-ENGAGEMENT:**

This activity is no longer in use. Re-engagement does not need to be added to the E/SP. See TANF 710-1

### **FINANCIAL SECURITY ACTIVITIES**

Non-Cash clients must use the Financial Literacy Non-TANF Cash category in CHIMES.

TANF Cash clients would negotiate activities under Job Search/Job Readiness – Financial Literacy category in CHIMES.

As part of financial literacy, budgeting must be discussed with the client at every meeting, this includes; but is not limited to, the initial assessment meeting, any time a change of income is reported, at the 90-day review, and when a supportive service is requested. A budget discussion must be documented in person notes.

**Effective Date:** February 24, 2022