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**State of Iowa  
Thomas J. Vilsack, Governor**

**Temporary Assistance for Needy Families  
State Plan**



**October 1999**

**Submitted Pursuant to Public Law 104-193  
The Personal Responsibility and Work Opportunity  
Reconciliation Act of 1996**

DEC 8 1999



THOMAS J. VILSACK  
GOVERNOR

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SALLY J. PEDERSON  
LT. GOVERNOR

October 29, 1999

The Honorable Donna E. Shalala  
Secretary  
U.S. Department of Health and Human Services  
200 Independence Ave., SW  
Washington, D.C. 20201

Dear Secretary Shalala,

I am pleased to submit Iowa's updated State Plan for Temporary Assistance for Needy Families (TANF) as required by Section 402 of the Social Security Act. This State Plan is submitted as a "new" plan for purposes of renewing the state's eligibility for federal funding under part A, Title IV, of the Act and replaces the state's current plan.

This State Plan and its attachments were developed in accordance with Section 402 of the Social Security Act and with federal regulations found in 45 Code of Federal Regulations, Parts 260-265. The plan includes all required elements as well as some optional elements that would otherwise have to be reported in the state's annual report. The plan describes programs and services using either federal TANF or state maintenance of effort funding. Required certification statements and assurances are also included.

As described in the State Plan, Iowa is using its federal TANF and state maintenance of effort funds to provide a wide range of services and benefits to families and individuals intended to meet one or more of the statutory purposes of the TANF program. The state continues to be a national leader in developing innovative strategies to help families become self-sufficient by emphasizing work and personal responsibility.

Iowa's welfare reform measures have been very successful to date as evidenced by Iowa's meeting mandatory work participation rates for all families and 2-parent families. Given this success, Iowa continues to choose to opt out of the community service provision in Section 402(a)(1)(B)(iii) at this time to maintain maximum flexibility in helping families become self-sufficient.

Thank you for your continued support and assistance.

Sincerely,

Thomas J. Vilsack  
Governor

TJV/dam  
SHALALATANF





OFFICE OF THE GOVERNOR

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October 12, 1999

The Honorable Dennis B. Shafer  
Secretary  
U.S. Department of Health and Human Services  
300 Independence Ave., SW  
Washington, D.C. 20201  
Dear Secretary Shafer:

I am pleased to submit Iowa's updated State Plan for Temporary Assistance for Needy Families (TANF) as required by Section 402 of the Social Security Act. This State Plan is submitted as a "new" plan for purposes of renewing the state's eligibility for federal funding under part A, Title IV, of the Social Security Act and replaces the state's current plan.

This State Plan and its attachments were developed in accordance with Section 402 of the Social Security Act and with federal regulations found in 45 Code of Federal Regulations Parts 263.2(b), 265.9(b), and 265.9(c). The plan includes all required elements as well as some optional elements that would otherwise have to be reported in the state's annual report. The plan describes programs and services using either federal TANF or state maintenance of effort funding. Required certification statements and assurances are also included.

As described in the State Plan, Iowa is using its federal TANF and state maintenance of effort funds to provide a wide range of services and benefits to families and individuals intended to meet one or more of the statutory purposes of the TANF program. The state continues to work to ensure that its TANF program strategies to help families become self-sufficient by encouraging work and personal responsibility.

Iowa's welfare reform measures have been very successful in that as evidenced by Iowa's meeting mandatory work participation rates for all families and 1-parent families. Given this success, Iowa continues to choose to opt out of the community service provision in Section 403(a)(1)(B)(ii) at this time to maintain maximum flexibility in helping families become self-sufficient.

Thank you for your continued support and assistance.

Sincerely,

Thomas J. Vilsack  
Governor

TJW:dam  
10/12/99

STATE OF IOWA

STATE PLAN FOR TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)  
EFFECTIVE 10/1/99

This State plan was developed in accordance with Section 402 of the Social Security Act, as amended by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193). This State plan is submitted as a "new" plan for purposes of renewing the state's eligibility for federal funding under part A, Title IV, of the Social Security Act. Substantive changes to the prior State TANF plan are identified in Attachment D. The information submitted below restates the pertinent requirements of Section 402 and then provides the information that outlines the provisions of Iowa's program.

This State plan also provides information required by federal regulations at 45 Code of Federal Regulations (CFR) 263.2(b) effective October 1, 1999, as well as optional information that would otherwise be required in the state's annual report under federal regulations at 45 CFR 265.9(b) and (c), as allowed under 265.9(d), also effective October 1, 1999. Specifically, this State plan complies with 45 CFR 265.9(b)(1), (2), (3), (5) [excluding aggregate numbers of good cause domestic waivers granted which will be included in the annual report], (6), (7), and (8) [any programs intended to meet the third or fourth statutory purpose of TANF are identified as such]; and with 45 CFR 265.9(c)(1), (2), (6), (7), (8), and (9). Information conforming with these regulations is incorporated throughout this State plan, typically within the descriptions of individual programs. Attachment E contains a full description of the individual regulatory cites above. Pursuant to 45 CFR 261.56, effective October 1, 1999, this State plan also includes the criteria and definitions used by the state to determine whether a single custodial parent with a child under age six has demonstrated an inability to obtain needed child care and is subsequently exempt from sanction for failure to meet required work requirements.

IOWA DEPARTMENT OF HUMAN SERVICES

The Iowa Department of Human Services (IDHS) is a single state agency responsible for providing a broad array of services to the State. Included are institutional and community-based programs; mental health resources, including psychiatric hospital and hospital schools for the mentally retarded; and programs delivered by regional and county offices which are responsible for most of the direct services provided, including those covered by Title IV-A. The Divisions of (1) Economic Assistance, (2) Medical Services, (3) Adult, Children and Family Services and (4) Mental Health and Developmental Disabilities are responsible for program development under the Deputy Director of Policy. The Department of Human Services administers Temporary Assistance for Needy Families (TANF) which, in Iowa, includes Family Investment Program (FIP) cash assistance and other programs funded in whole or in part with TANF or maintenance of effort funds.



Support services are provided by units under the Deputy Director for Administration, and by the Office of Field Support under the Deputy Director for Field Operations.

IDHS contracts with the Iowa Department of Inspections and Appeals (IDIA) to conduct hearings, eligibility investigations and recovery of overpayments. However, IDHS is not delegating authority to IDIA to exercise administrative discretion for supervision of the state plan or to issue program policies, rules or regulations. IDIA contract personnel are not IDHS employees. To the extent that they perform IDHS work, they are agents and representatives of IDHS.

PROMISE JOBS services are provided by Iowa Workforce Development (IWD) under contract with IDHS and by the Bureau of Refugee Services (BRS) under the IDHS Deputy Director for Field Operations.

The Iowa Department of Human Services is headed by a Director, selected by the Governor and confirmed by the Senate. A Council on Human Services acts in policy-making and advisory capacity to IDHS. Council members are appointed by the Governor and confirmed by the Senate. Three Deputy Directors as well as division administrators are appointed by the Director of IDHS and are not subject to a set term in office.

## SECTION 402 - STATE PLAN REQUIREMENTS

### (a)(1) OUTLINE OF FAMILY ASSISTANCE PROGRAM

**(A) General Provisions - A written document that outlines how the State intends to do the following:**

**(i) Conduct a program, designed to serve all political subdivisions in the State (not necessarily in a uniform manner), that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program and become self-sufficient.**

#### **Definition of Needy Family**

A "needy family" is a family meeting the income and resource limitations and other eligibility criteria of the Family Investment Program (FIP) or one of the programs defined later in this State Plan under "Other TANF and Separate State Programs."

#### **Iowa's Family Investment Program (FIP)**

The Family Investment Program or FIP provides cash assistance to needy Iowa families as they become self-supporting.

Major welfare reform in Iowa began in 1993 when legislation was passed by the Iowa General Assembly authorizing the Iowa Department of Human Services to seek a series of AFDC federal waivers which, if approved, would result in an extensive redesign of Iowa's AFDC program. The federal Department of Health and Human Services (DHHS) approved the waivers which were then implemented statewide on October 1, 1993. Many requirements of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 coincided with Iowa's welfare reform waivers already in place and approved by DHHS in 1993. As a result, the waivers were terminated via correspondence to the U.S. Department of Health and Human Services dated 7/18/97.

Policies and procedures for the Family Investment Program are described in chapter 239B of the Code of Iowa, Titles IV and IX of the Iowa Administrative Code, and Title 4 of the Employees' Manual. A detailed description of all policies and procedures is found in the Family Investment Program manual which is available for viewing by the public in any of the Department's local offices located in all ninety-nine counties.

Major changes in FIP policy that have occurred since the last TANF State Plan are identified throughout this document.

*Goals and objectives of Iowa's Family Investment Program are:*

- Provide an incentive to work and make work pay to lead families to self-sufficiency.
- Encourage family stability and the formation of families.
- Encourage and increase asset-building to protect clients from everyday accidents and illnesses that otherwise would become crises, thereby lessening the need for and reliance on public assistance.
- Provide clients with the opportunity and expectation to take personal responsibility to become self-sufficient and also provide them with the necessary tools to move out of poverty. Provide for consequences for those who do not comply with program requirements.
- Empower clients to take advantage of options by making real choices.
- Remove policies that present barriers to families reaching economic independence.

The goals and objectives above may change over time with public input. We focus measurements of success on earned income increases and whether families are leaving and remaining off the Family Investment Program.



*Eligibility Requirements are:*

Iowa's Family Investment Program provides cash assistance to families with dependent children.

A "dependent" child is one who is:

(1) Under age 18, or is under age 19 and a full-time student in secondary school or the equivalent level of vocational or technical training and reasonably expected to complete high school or comparable program before reaching age 19. A child under age 18 is eligible for assistance without regard to school attendance. However, a child 16 through 18 who does not attend school full-time must cooperate with PROMISE JOBS and complete a Family Investment Agreement as described in (ii).

The child becomes an adult when the child marries, unless the marriage is annulled.

(2) Deprived of parental support or care of at least one parent. When both parents are in the home, at least one parent must meet incapacity or unemployed parent criteria.

(3) In financial need according to Iowa's Family Investment Program. The income of FIP applicants and recipients must be within the following limits:

Based on number of people in the eligible group.

Gross Monthly Income Limits:

- |               |                |
|---------------|----------------|
| 1) \$0,675.25 | 6) \$2,249.60  |
| 2) \$1,330.15 | 7) \$2,469.75  |
| 3) \$1,570.65 | 8) \$2,695.45  |
| 4) \$1,824.10 | 9) \$2,915.60  |
| 5) \$2,020.20 | 10) \$3,189.40 |

Add \$320.05 for each additional person.

Net Monthly Income Limits:

- |          |           |
|----------|-----------|
| 1) \$183 | 6) \$610  |
| 2) \$361 | 7) \$670  |
| 3) \$426 | 8) \$731  |
| 4) \$495 | 9) \$791  |
| 5) \$548 | 10) \$865 |

Add \$87.00 for each additional person

Net income is determined after allowing specified deductions and disregards as provided for in Iowa Administrative Code (IAC) 441—41.27.

Resource limits are \$2,000 for applicant families and \$5,000 for recipient families.

(4) Living with a specified relative within the degree of relationship defined by Iowa's program, including second cousins who were added effective July 1997. A specified relative must be related to the child either by blood or marriage even if the marriage is terminated by death or divorce, and must maintain and share the home with the child.

"Living with" implies the existence of a relationship in which the relative accepts responsibility for the care and control of the child even while the child or relative is temporarily absent as described below under "Other eligibility requirements."

Other eligibility requirements:

(1) The following people **must** be included in the eligible group, if living together and meeting non-financial eligibility criteria of the program:

- the dependent child;
- any sibling of the dependent child (of whole or half-blood, or adoptive) who meets the deprivation, age and school attendance requirements;
- any natural or adoptive parent of the dependent child.

Included in the eligible group are the needs of people who are temporarily absent for a period of no more than three consecutive months. Good cause extensions are given to people who are temporarily absent because they are:

- in a medical institution for less than a year; or
- securing education or training.

The following people **may** be included in the eligible group:

- the needy relative who assumes the role of a parent when the child's parent is not in the home;
- the needy relative who acts as payee when the parent is in the home but unable to act as payee; and
- the incapacitated stepparent.

(2) Each member of the eligible group must be a citizen or qualified alien.

- (3) Each member must be a resident of Iowa.
- (4) Each member must have a social security number or proof of application for a number.
- (5) The parent or caretaker must assign all rights to support to IDHS and must cooperate in obtaining support. Assigned child support retained by the state is not used to determine ongoing FIP eligibility (effective February 1998). Effective March 1998, a 25% grant reduction is imposed when the parent or caretaker fails to cooperate in obtaining support. Iowa provided child support rebates to FIP recipients until July 1998 when the rebate program was totally phased out.
- (6) Each member must apply for and accept benefits from certain other sources, if eligible.
- (7) Each member must cooperate with the Iowa Department of Inspections and Appeals (IDIA) Front End Investigations Unit.
- (8) When the parent of the dependent child is under age 18, never married (or marriage was annulled), the minor parent must live with the adult parent or a legal guardian or establish good cause for not living with the adult parent or legal guardian.
- (9) Children must attend school as required by state law. As of March 1998, FIP assistance is reduced by 25% if a child who has not completed sixth grade is deemed truant without good cause.
- (10) People whose needs are met by any other public assistance program administered by IDHS or another state, including IV-E or state-funded foster care, or who receive SSI must be excluded from the eligible group.
- (11) People participating in a strike are ineligible. If the striker is a parent, the entire family is ineligible.
- (12) Iowa will not use TANF or maintenance of effort (MOE) funds to provide FIP to any family that has received FIP assistance for sixty months (whether or not consecutive) as described at 45 CFR 264.1(a) and (b). In the case of a child living with a nonparental caretaker relative, the nonparental caretaker relative is removed from the FIP grant after receiving FIP for sixty months, but the caretaker may continue to receive FIP for the child. In the case of a child living with a

parent or the parent's spouse, the entire family is ineligible for FIP after the parent or spouse has received FIP for sixty months.

Parents excluded from the FIP grant are not subject to the federal limits described at 45 CFR 264.1(a) and (b). However, Iowa's state time limit of sixty months does apply to families including such excluded parents. Iowa considers any parent living in the home of a FIP child to be a "recipient of assistance" for purposes of the sixty-month limitation even when the parent's needs are not included in the FIP grant. Therefore, the entire family is ineligible for FIP after the parent has received FIP for sixty months regardless of whether the parent is or is not on the grant. However, any month that the parent receives Supplemental Security Income or is eligible for the exemption described at 45 CFR 264.1(b)(1)(ii) does not count against the sixty-month limit.

*Calculating the Grant:*

The FIP eligible group must meet income and resource limits established for Iowa's Family Investment Program. The assistance grant is based on the number of people in the eligible group. The income of people in the eligible group and other people who live in the home whose income must be considered (e.g., excluded parents, ineligible stepparents, self-supporting parents of a minor parent), after appropriate disregards, must meet Iowa's income tests. The income and resources of a person on Supplemental Security Income are disregarded.

Income disregards and deductions are the same as those under the prior AFDC program except:

- Effective October 1997, the Work Transition Period (a four-month disregard of earned income for certain long-term unemployed recipients) was eliminated.
- Effective November 10, 1997, Iowa began disregarding all financial assistance for education or training as income and resources.
- The FIP child care disregard was eliminated effective July 1, 1999. FIP recipients and other people whose earned income is considered for FIP are now automatically eligible for state child care assistance without regard to the latter program's eligibility requirements and waiting lists.



*Program Benefits, Funding, and Method of Payment:*

The assistance grant is issued monthly, but may include a separate payment for special needs. Payment is issued in the form of a state warrant, by direct deposit, or electronic benefit transfer. FIP assistance may be effective as early as seven days from application for any family (including two-parent households since January 1998) who otherwise meets all eligibility requirements.

Iowa's cash assistance program is available statewide. The program is funded with commingled TANF and state maintenance of effort funds.

*Coordination with Medicaid, Food Stamps, and Other Programs*

IDHS is cognizant of the critical need that FIP policies and procedures not interfere with a family's ability to receive benefits and services from other programs such as Medicaid and food stamps. Staff working with the FIP program in Iowa actively coordinate with Medicaid and food stamp program outreach and other activities to ensure that families receive benefits to which they are entitled. Additionally, IDHS makes a concerted effort to develop or revise FIP policies and procedures that encourage consistency between the various programs. For example, effective September 1999, FIP program policy was changed to match policy in the Food Stamp Program, and to the extent possible in the Medicaid program, in the following areas: treatment of late review forms, failure to timely report changes, recurring lump sums, earnings in-kind, and non-homestead property.

**Other TANF and Separate State Programs**

The following is a list of all other current Iowa programs which use either TANF or state maintenance of effort funding. At the present time, Iowa does not have any Segregated State Programs. Separate State Programs used for maintenance of effort are identified below. Except for those programs below which are specifically identified as Separate State Programs, each program listed uses either all TANF funds or commingled TANF and state maintenance of effort funds.

All programs, benefits, and services for which state funds may be claimed for maintenance of effort (MOE) purposes under Section 409(a)(7) of the Social Security Act, as amended by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193), were either previously authorized and allowable as of August 21, 1996, or were implemented after that date. Consequently, in accordance with 45 CFR 265.9(c)(7) and (8), information about state expenditures on MOE programs for federal fiscal year 1995 are not required and are not included.

Of the programs listed below, only TANF funding for Family Investment Program cash grant assistance is considered "assistance" within the federal TANF definition and, consequently, counts toward a family's 60-month lifetime limit.

Citizenship, eligible alien status, and social security number requirements apply to all programs to the extent required by federal law.

In those instances where the description of a program indicates that a family must be participating in FIP or otherwise eligible for FIP as a condition for receiving benefits or services, the FIP income limitations and other eligibility criteria previously described [including household composition] apply unless otherwise specified. FIP income limitations and other eligibility criteria also apply to any program where the program description indicates the family must be participating in PROMISE JOBS services as described below. Descriptions of programs dependent on FIP eligibility criteria do not repeat these criteria.

- *PROMISE JOBS Services:* This program provides work and training services for people in families eligible for FIP cash assistance. Refer to (ii) for a description of family members eligible for services. PROMISE JOBS provides employment, post-employment, and training activities through the Family Investment Agreement. Under certain conditions, people may continue to receive PROMISE JOBS assistance and services for a limited period after becoming ineligible for direct cash assistance. Refer to "Diversion Programs: Post-FIP Diversion" for information about other services provided after an employed person leaves the FIP program.
- *PROMISE JOBS Expense Allowances:* This Separate State Program provides the following supports to people in the PROMISE JOBS program when the activity is approved under the Family Investment Agreement:
  1. transportation;
  2. per diem allowances for certain people in practicums who must live away from home while in school;
  3. tuition, fees, books, and supplies for people in short-term training;
  4. On-the-Job Training allowances to employers;
  5. birth certificates when needed to register for work; and
  6. safety equipment.

The state funds expended for this program are used to meet TANF maintenance of effort requirements as they meet the criteria of 409(a)(7)(B)(i)(I) and (II)(bb) of Title IV-A of the Social Security Act.

- *Family Development and Self-sufficiency (FaDSS) program.*

This program provides intensive family development services to families receiving FIP and identified as having multiple or severe barriers to self-sufficiency. FaDSS participants leaving FIP for reasons other than a sanction can continue to receive services for up to 90 days after leaving. Former cash recipients receiving FaDSS services continue to receive monthly home visits during the 90-day period to help enable them to progress toward permanent self-sufficiency. Former cash recipients receiving FaDSS services are not required to complete any type of application form or to meet any income or resource eligibility criteria. The program is available statewide and services are provided by contracted agencies.

- *Post-employment program.*

The Department is in the process of developing a post-employment program to provide services and short-term benefits that will not meet the definition of "assistance" as defined at 45 CFR 260.31. These services will be offered to current PROMISE JOBS recipients. The services offered in these pilots will be designed to provide participants with the skills necessary to retain employment, gain job advancement, and achieve economic self-sufficiency. The services may include, but are not limited to: intensive case management, skill building workshops, employer-based services, mentoring, and monetary payments in the form of Family Self-Sufficiency Grants as defined later in this State plan. Future plans call for combining the Post-employment program with the Post-FIP Diversion program described later in this plan to provide continuity of support services as families leave FIP due to employment and become self-sufficient.

- *Iowa Transitional Assistance for Direct Education Costs (ITADEC) program.* This Separate State Program was created effective 3/1/97. It provides funds to pay for direct education costs for certain PROMISE JOBS participants that previously had been funded through the PROMISE JOBS program. To be eligible for ITADEC, the PROMISE JOBS participants must meet two criteria:

(1) the person must have been enrolled and participating in a PROMISE JOBS-funded post-secondary vocational classroom training plan on March 1, 1997; and

(2) the participant must continue to carry out the training plan according to the steps of the Family Investment Agreement.

Direct education costs are tuition, books, fees, supplies, and required uniforms. The state funds expended for this program are used to meet TANF

maintenance of effort requirements as they meet the criteria of 409(a)(7)(B)(i)(I) and (II)(bb) of Title IV-A of the Social Security Act.

- *Child Care Assistance:* This Separate State Program provides state funding for child care needs of families eligible for the Family Investment Program. Federal law places a cap on the amount of expenditures that may be claimed as TANF maintenance of effort (see 409(a)(7)(B)(iv) of Title IV-A of the Social Security Act). Iowa applies state-funded expenditures toward the cap in the following priority order:

- (1) child care needs of working parents;
- (2) child care needs of a PROMISE JOBS participant in work and training activities as outlined in their Family Investment Agreement, or a parent in education or training for a portion of the day.

The child must be under age 13 (under age 19 if child has special needs).

- *Housing-Related Emergency Assistance (EA):* This program provides up to \$500 per year to a family with a child under the age of 18 or expected to graduate high school or the equivalent by age 19. The program is available statewide to homeless families and those at risk of becoming homeless. Benefits are provided only during one 30-day period in any twelve consecutive months. Benefits are provided by vendor payment and include rent, house payments, utilities, purchase or repair of heating equipment, rent and utility deposits. In order to qualify, a family's income must be at or below 100% of the federal poverty level, and liquid resources cannot exceed \$1,000.

For purposes of this program, members of the eligible family include the following when living in the same household: the applicant, the applicant's legal or common-law spouse, the child(ren) of the applicant as defined above, any legal or biological parent of the child(ren), and any siblings of the applicant's children of whole or half blood or adoptive. An eligible family may also include the applicant and any child(ren) under the care of the applicant when the applicant meets the definition of "relative" under Iowa Administrative Code IAC 441—41.22(3)"a". People above temporarily not living in the household on the date of interview are not included in the eligible family.

- *Parental Responsibility Pilot Program and Other Innovative Strategies:* The Parental Responsibility Pilot program is TANF-funded. The program is intended to help parents develop and maintain relationships with their children and meet their parental responsibilities, not limited to financial support. The program is expected to use collaborations consisting of existing community resources to provide an array of services including: family counseling, legal



services, mediation, job training, substance abuse treatment, health maintenance, and personal mentoring. Benefits will not include direct cash assistance to either parent. This program is still in the development stage and will initially be available in Polk County, the largest metro county in the state.

Other TANF-funded innovative strategies may be implemented in the future to support job retention, family structure, or both, including services to non-custodial parents.

This program is intended to meet the 4<sup>th</sup> statutory objective of TANF to encourage the formation and maintenance of two-parent families.

- **Diversion Programs:** These programs provide immediate, short-term funds or services to enable families to become or remain self-sufficient by removing barriers to obtaining or retaining employment. These programs are designed to divert families only from cash assistance under FIP; they are not designed to divert families from other types of benefits such as Medicaid and food stamps. Families are routinely advised of other benefits they may be eligible for and that may help divert them from FIP. Below is a description of each Diversion program implemented to date:

(1) *Pre-FIP Diversion* — This pilot program operates in specified areas of the state and serves Iowa families that meet FIP income limits, have an eligible child in the home, provide social security numbers, and volunteer for the program in lieu of receiving FIP cash assistance. This program uses FIP criteria for determining what people are considered part of the eligible group or family.

Candidates ineligible for cash assistance due to a first-time limited benefit plan caused by a failure to meet work and training requirements are eligible for support services but not for benefits having cash value. Candidates ineligible for cash assistance under a subsequent limited benefit plan for failure to meet work and training requirements are not eligible for any type of services or benefits under this program.

Candidates must have identifiable barriers to obtaining or retaining employment that can be substantially addressed through the immediate, short-term benefits or services offered by a pilot program in accordance with the local plan. While a family may be a candidate more than once, this program is not to be used to provide ongoing benefits. The means of providing diversion benefits or services are outlined in each local plan. Examples include:

- \* Transportation costs, including car repair, payments, license fees;

- \* Shelter costs, including rent, mortgage, utilities;
- \* Job specific expenses , including licensing fees, tools, uniforms, shoes;
- \* Very limited, short-term child care

Benefits can be in the form of cash payments, vendor payments, vouchers, or non-cash services, or any combination. Supplanting of services already available through local resources at no cost to the family or IDHS is prohibited. Receipt of Diversion benefits having a cash value to the family results in a period of ineligibility for FIP.

(2) *Community Self-Sufficiency Grants* — These grants are available to fund local collaborative pilot demonstrations which can apply innovative ways to remove community-wide or systemic barriers that impede the ability of PROMISE JOBS participants (FIP eligible families) to become and remain successfully employed. Current projects include increasing the level of employment of one of Iowa's poorest areas through the effort of providing more child care during non-traditional work hours and providing a referral system to help facilitate the repair of cars through a network of car repair shops.

(3) *Family Self-Sufficiency Grants* — These grants are available statewide for payment to families or on behalf of families. The purpose of the benefits or services is to help PROMISE JOBS participants address problems they have in becoming self-sufficient. The grants are designed to pay for products or services that are necessary for the PROMISE JOBS participant to keep or accept employment and that are not available through other sources. It must be reasonably anticipated that a payment will assist the family to retain employment or obtain employment in the two full calendar months following the date of authorization of payment.

The grants must not duplicate assistance available under regular PROMISE JOBS policies or available through local community resources, but are to address barriers to self-sufficiency by meeting expenses that cannot be approved under the regular PROMISE JOBS policies. Local plans differ in the benefits or services offered to the recipient. Examples include:

- \* Car repair or maintenance
- \* Relocation costs
- \* Telephone deposit and hook-up charges
- \* Licensing fees
- \* Very limited, short-term child care



- \* Job interview clothing or special clothing related to a job (e.g., boots)
- \* Time management items (alarm clocks, calendars)
- \* Tools

(4) *Post-FIP Diversion* — This pilot program provides services to help stabilize or improve the employment status of families leaving FIP cash assistance. The program is intended to reduce the likelihood of the family returning to cash assistance. Some adult member of the household must be employed or lose employment while participating in the program.

Candidates ineligible for cash assistance due to a first-time limited benefit plan caused by a failure to meet work and training requirements are eligible for support services but not for benefits having cash value. Candidates ineligible for cash assistance under a subsequent limited benefit plan for failure to meet work and training requirements are not eligible for any type of services or benefits under this program.

Projects provide services for up to 12 months after a family leaves the FIP program, to help the employed person navigate through the transition from FIP to work. There must continue to be an eligible child in the home and family gross income must be at or below 200% of federal poverty levels. The means of providing Diversion services is outlined in each local plan. Examples include:

- \* Car repair or maintenance
- \* Relocation costs
- \* Telephone deposit and hook-up charges
- \* Licensing fees

Supplanting of services already available through local resources at no cost to the family or IDHS is prohibited. In addition to the services provided over the 12-month period by these projects, some limited cash assistance may be available to help meet a short-term need or overcome a barrier. Receipt of benefits having a cash value to the family will result in a period of ineligibility for FIP.

As previously indicated, future plans call for combining the Post-FIP Diversion program with the Post-employment program described earlier in this plan to provide continuity of support services as families leave FIP due to employment and become self-sufficient.

- *IV-A Emergency Assistance Program*: The state uses TANF funds for a number of child welfare services for which the state was authorized to use funds under prior IV-A Emergency Assistance law as of September 30, 1995. These services currently include: wraparound program; family assistance fund; social casework; family preservation; family foster care; protective day care; adolescent monitoring and tracking; and shelter care (over 48 hours).

Families must meet general child welfare eligibility criteria regardless of the specific services(s) being sought: residency, an eligible child (under age 18, although some services are available up to age 21), and a need for services. Children meeting general eligibility are then screened for eligibility for TANF funding of services (initially and at 6-month intervals while services are provided).

Eligibility criteria for TANF funding is the same as under prior law for IV-A funding: there must be an emergency situation that did not result from a refusal of employment; an application must be made on behalf of a child under age 18 needing one or more IV-A eligible services; the family must meet service eligibility criteria based on the type(s) of service sought; the family must be receiving FIP, Food Stamps, Medicaid, or SSI in the month of application, or does not have cash to provide needed emergency care or services; and the family must not have applied for IV-A Emergency Assistance in the last 12 months.

State funds may be expended for this program and used to meet TANF maintenance of effort requirements when criteria in 409(a)(7)(B)(i) of Title IV-A of the Social Security Act are met.

- *Pregnancy Prevention*: TANF funds are used for teen pregnancy prevention programs designed to prevent adolescent pregnancy and to promote self-sufficiency and physical and emotional well-being for pregnant and parenting adolescents. Eligible adolescents must be less than eighteen years of age and attending school to pursue a high school diploma or equivalent. There are no income or resource criteria. Services to an adolescent under 18 may continue beyond the adolescent's eighteenth birthday under certain circumstances.

This program is intended to meet the 3<sup>rd</sup> statutory objective of TANF to prevent and reduce the incidence of out-of-wedlock pregnancies. As individuals and families do not have to be "needy" based on financial criteria to receive services under this program, expenditures of any state funds under this program are not eligible for TANF maintenance of effort (MOE) purposes and will not be claimed for MOE.



- *Family Planning:* TANF funds may be used for family planning to provide people of child-bearing age, as defined under Title X of the Social Security Act, with educational and health services to encourage responsible family planning by voluntarily planning or limiting pregnancies. Eligible people must reside in Iowa and have no other source of payment such as Title XIX. Families must meet gross monthly income limits based on family size: 1 = \$583; 2 = \$762; 3 = \$942; 4 = \$1,121; 5 = \$1,299; 6 = \$1,478; 7 = \$1,510; 8 = \$1,546; 9 = \$1,581; 10 = \$1,612; add \$33 for each additional person. The income of people living in the household responsible for the support of the individual applying for services is considered in determining eligibility. There are no resource eligibility criteria.

This program is intended to meet the 3<sup>rd</sup> statutory objective of TANF to prevent and reduce the incidence of out-of-wedlock pregnancies. State funds may be expended for this program and used to meet TANF maintenance of effort requirements when criteria in 409(a)(7)(B)(i) of Title IV-A of the Social Security Act are met.

- *Individual Development Accounts:* TANF funds are used for Individual Development Accounts (IDAs) to encourage low-income families to own and accumulate assets for long-term goals and become economically self-sufficient.

IDAs are savings accounts matched by public and private funds that are restricted to high return investments such as college education, job-training for higher skill/higher wage jobs, starting a business, or buying a first home. IDAs recognize that people escape poverty and achieve wealth by saving and acquiring assets, not by spending and consuming.

In Iowa, the state partners with local community organizations that manage local IDA projects, recruit account holders, raise matching funds for IDAs from individual and charitable contributions, maintain deposits in local financial institutions, and build local community support. Eligibility to own an IDA is restricted to Iowans whose family household income does not exceed 200% of the federal poverty level. Income earned on deposits is exempt from state income tax and the state makes an annual match against each account holder's yearly contributions.

To establish eligibility, community organizations require participants to furnish the previous year's income tax return; wage statements; evidence of participation in the U.S. Department of Housing and Urban Development's Section 8 Assisted Housing, Family Investment Program, Food Stamps, or Medicaid; or some other documentation which will corroborate income status. Local projects specify application procedures, forms, and documentation.

IDAs benefit low-income Iowans in a number of ways:

1. IDAs are a tool that enable families to achieve the American dream of home ownership, education, or business ownership.
2. IDAs encourage people to save and plan for the future, increases their economic literacy, and enables them to assume more control over their own economic future.
3. Assets accumulation promotes economic well-being of families and helps build communities.
4. IDAs promote inclusion of the poor in the economy and in the social fabric of their community.
5. Matches by the local IDA organization and contributions by other individuals or organizations will grow the accounts and help the account-holder realize long-term goals.

Iowa's IDA project is authorized by *Code of Iowa, 1999, chapter 541A*, and is implemented through the IDHS administrative rules at 441 -- 10(541A) *Individual Development Accounts*.

For purposes of this program, members of the eligible family include the following when living in the same household: adults related by blood, marriage or adoption or who are unrelated but have maintained a stable family relationship together over a period of time, and individuals under age 18 years of age related to the above adults by marriage, blood or adoption.

- *Transfers to the Social Services Block Grant (Title XX) and the Child Care Development Fund (CCDF):* TANF funds are transferred to the Social Services Block Grant and CCDF within the parameters of federal law at Title IV-A, Section 404(d) of the Social Security Act. Funds transferred to CCDF are used for a variety of initiatives including early childhood development, development of quality child care, meeting the child care needs of low-income Iowans, and so on.
- *Job Access and Reverse Commute (JARC) Grants:* TANF funds are used as match for some of Iowa's JARC grants as authorized under Section 404(k) of the Social Security Act. Information about individual JARC projects is available upon request by contacting the TANF State Coordinator at the address indicated at the end of this State plan.

**(ii) Require a parent or caretaker receiving assistance under the program to engage in work (as determined by the State) once the State determines the parent or caretaker is ready to engage in work, or once the parent or caretaker has received assistance under the program for 24 months (whether or not consecutive), whichever is earlier.**

For purposes of Section 402(a)(1)(A)(ii), "engaged in work," as defined by Iowa, means participation in Family Investment Agreement activities.

Participants who are disabled are exempt from the Family Investment Agreement process and are "engaged in work" while carrying out the actions required by their exemption but may request and receive the full array of services at their option.

The goal of Iowa's PROMISE JOBS work and training program is to assure that needy families with children obtain the training, education and employment that will help them become economically self-sufficient and avoid long-term dependence on public assistance. A key element is the establishment of the Family Investment Agreement. The Family Investment Agreement is an individualized agreement between IDHS and the recipient. The agreement addresses a particular family's needs, the services to be provided by IDHS, the actions the family will take and the time frame to be met by the family to attain self-sufficiency. Families who do not achieve self-sufficiency at that point after making a good faith effort to do so will have their Family Investment Agreement renegotiated and amended.

Unless determined to be exempt, the following people must participate in PROMISE JOBS and develop a Family Investment Agreement:

1. all adults on the FIP grant;
2. all minor parents on the FIP grant;
3. all children ages 16 to 19 on the FIP grant but not in school full-time; and
4. any parent excluded from the FIP grant but living with a child on FIP, provided the parent is a citizen or legal qualified alien.

Since July 1997, exemptions are granted only to people listed above who are disabled and unable to participate. People who are exempt may volunteer for the program.

Maintenance of effort funds under a separate state program are used to fund the costs related to an excluded parent's participation in PROMISE JOBS when the excluded parent is a citizen or legal qualified alien. Illegal aliens and legal nonqualified aliens are not eligible for PROMISE JOBS.

The Family Investment Agreement requires each mandatory person to participate in one or more of the following activities after orientation and assessment are completed:

- Full-time or part-time employment.

Full-time employment means 30 hours or more per week or 129 hours or more per month. Part-time employment means anything less than this.

- Job-seeking skills training and group or individual job search.

This activity includes but is not limited to: self-esteem building, goal attainment planning, resume development, grooming, letters of application and follow-up letters, job application completion, job retention skills, motivational exercises, identifying and eliminating employment barriers, positive impressions and self-marketing, finding job leads, obtaining interviews, use of telephones, interviewing skills development, and practice interviewing.

- Classroom training

This activity includes but is not limited to: high school completion or GED, adult basic education, English as a second language, post-secondary education, and any other academic or vocational training course of study that enables the participant to complete high school, improve one's ability to read and speak English, or prepares the individual for a specific professional or vocational area of employment.

- Family development programs.

Services under this activity are designed to promote, empower, and nurture the family to self-sufficiency and healthy reintegration into the community.

- Work experience placement.

Work experience combines placement at work sites that provides participants with work experience and on-the-job-training while providing services that are of direct benefit to the community, with job search activities.

- On-the-job training.

Under this component a participant is hired by a private or public employer, and while engaged in productive work, receive training that provides knowledge or skills essential to the full and adequate performance of that job.

- Unpaid community service.

This activity provides participants with opportunities to establish or re-establish contact with the workforce in a non-threatening environment while providing services to that are of direct benefit to the community. Work sites are public or private nonprofit organizations and specific skills-training tasks are not required.



- Parenting skills training.

Parents age 19 and younger are required to include parenting skills in their family investment agreement. Parents age 20 and older can participate in this activity provided they also participate in at least one other activity. Training may include but not be limited to the following: child growth and development, child health and nutrition, child safety, positive discipline, relationships, and life skills.

- Mentoring program services.

This activity uses volunteer mentors who guide and support FIP participants to become self-reliant through individual growth, job retention, and economic stability. Mentors help FIP participants increase skills related to: teamwork, conflict resolution, improved communication, interpersonal relationships, money management, and other activities enabling the family to successfully function independently.

- Post-employment services.

These services provide assistance to employed FIP participants by removing barriers to retaining employment and developing skills necessary for job retention and career advancement. Activities could include but are not limited to any activity described previously in this section.

- Family planning counseling services.

These services are optional, and are offered to each participant. Information is provided to participants about the financial implications of newly born children on family finances and on the ability to complete the family investment agreement. Information on the basics of family planning is provided as is a list of local family planning resources. Family planning cannot be the only component of the family's family investment agreement.

In addition, participants have access to all services offered by the PROMISE JOBS provider agencies. Participants in work or training programs outside of PROMISE JOBS can include those in their Family Investment Agreements. Barriers to participation in the Family Investment Agreement cannot be used to excuse or exempt a mandatory person from participation but must be resolved so that participation can result.

IDHS contracts with the Iowa Workforce Development to provide the PROMISE JOBS services listed above. The Department's Bureau of Refugee Services provides the services, to the extent possible with resources available, to people who entered the United States with refugee status. The provider agencies

determine PROMISE JOBS participants' needs for supportive services and authorize payment for the services.

**(iii) Ensure that parents and caretakers receiving assistance under the program engage in work activities in accordance with Section 407.**

Based on the PROMISE JOBS assessment, individuals will include appropriate work activities (as defined by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996) in their Family Investment Agreements. In some cases, Iowa may include activities in addition to those in Section 407 which will enable the adult to succeed. Policies and procedures are in place to protect workers from displacement (see Attachment G).

People who are required to participate in PROMISE JOBS who fail to sign a Family Investment Agreement, or who sign a Family Investment Agreement but fail to carry out the terms of the agreement, enter a limited benefit plan.

IDHS redesigned the limited benefit plan effective June 1999 to implement recent state law changes. A first limited benefit plan now results in ineligibility for the entire family indefinitely until such time as the parent completes significant contact or action with the PROMISE JOBS program. For a second or subsequent limited benefit plan, the family is ineligible for FIP for six months and will continue to be ineligible after the six-month period is over until the parent completes significant contact or action with the PROMISE JOBS program. If the agreement-responsible person is someone other than the parent or caretaker, only the individual will be ineligible.

Pursuant to 45 CFR 261.56, a limited benefit plan will not be imposed if the individual is a single custodial parent caring for a child who has not attained six years of age, and the individual proves that the individual has a demonstrated inability (as determined by the State) to obtain needed child care, for one or more of the following reasons:

(A) Unavailability of appropriate child care within a reasonable distance from the individual's home or work site.

(B) Unavailability or unsuitability of informal child care by a relative or under other arrangements.

(C) Unavailability of appropriate and affordable formal child care arrangements.

A limited benefit plan may be imposed if the individual refuses to participate in PROMISE JOBS when an acceptable form of child care is available.

Pursuant to 45 Code of Federal Regulations (CFR) 261.56, IDHS, the State TANF agency, has adopted the following definitions and criteria to be used in

determining if a single custodial parent with a child under age six demonstrates an inability to obtain needed child care and is exempt from sanctions for failure to meet work requirements.

**Appropriate Child Care** means that the child care provider is a licensed center, a registered child care home, an exempt facility, or someone who can pass child abuse and criminal record checks and can meet the minimum health and safety requirements for nonregistered child care home providers.

**Reasonable Distance** means that the required travel time from home to the work related activity does not exceed one hour each way including the travel time necessary to take a child to a child care provider.

**Affordable Child Care Arrangements** means that child care for approved PROMISE JOBS components is provided at no cost, except for the Monitored Employment component which may include a co-pay. Co-payments are based upon a sliding fee schedule through the Child Care and Development Fund in accordance with 441--IAC 130.4(234, 239B).

**Unsuitability of Informal Care** means a child care center who has not completed the licensing process or a nonregistered child care provider who cannot pass child abuse or criminal record checks or who cannot meet the minimum health and safety requirements for nonregistered child care home providers.

The unavailability of appropriate child care within reasonable distance from the participants home and work related activity does exempt a PROMISE JOBS participant from work requirements. Participants must demonstrate an inability to obtain needed child care. If the participant needs assistance in choosing a provider, the PROMISE JOBS or Department of Human Services (DHS) local office will refer the participant to the child care resource and referral agency serving the county or provide the participant with the list of approvable providers kept by the county DHS office. The availability of appropriate child care will be verified periodically. This exemption does not extend the 60 month life-time benefit limit.

IDHS informs parents of the child care exception to work requirement sanctions and of the definitions and criteria above used to determine whether a parent demonstrates an inability to obtain needed child care. Parents are also advised that granting this exception does not extend the time limit for receiving federal TANF benefits. The definitions and criteria above have been shared with the department's Division of Adult, Children and Family Services (ACFS) which administers the Child Care and Development Fund (CCDF) for the state.

**(iv) Take steps to restrict the use and disclosure of information about individuals and families receiving assistance.**

All IDHS records are open to the public except those containing confidential information. Confidential information cannot be disclosed except to administer programs of the Department or as otherwise authorized by federal or state law.

The following information is confidential:

- Names, addresses and the type of assistance provided.
- Client's social and economic circumstances.
- Agency evaluations.
- Medical or psychiatric data.

Information may be released to:

- Public officials to administer program requirements.
- Law enforcement officials under certain limited conditions.
- The public in the form of a quarterly list of the names, addresses and quarterly total amounts of assistance.

**(v) Establish goals and take action to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on teenage pregnancies, and establish numerical goals for reducing the illegitimacy ratio of the State for calendar years 1996 through 2005.**

Desired outcomes for reducing out-of-wedlock teen pregnancies and indicators of success in meeting these outcomes have been established in consultation with the public and the Iowa Legislature. Baseline data will be used to establish additional numerical goals. Iowa has programs that address reduction of out-of-wedlock pregnancies at a state and community level. Also, information about family planning counseling services is provided by PROMISE JOBS and the Family Development and Self-Sufficiency program.

**(vi) Conduct a program, designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded in scope to include men.**

The Department provides publicity and educational program resources for personnel of the department, people required to report child abuse, and any other appropriate people, to encourage the fullest possible degree of reporting of suspected cases of child abuse. Iowa law requires that all mandatory reporters of child abuse receive periodic training in the identification and reporting of child



abuse. Child abuse includes the sexual abuse of a child under the age of 18. Mandatory reporters of child abuse include, but are not limited to, the entities above.

Iowa Code Chapter 709 defines sexual abuse. The Department and law enforcement agencies jointly investigate and assess cases of alleged sexual abuse of a child when the allegations involve a "person responsible for the care of a child" as defined by state statute.

In addition, Iowa's adolescent pregnancy prevention and parenting programs at the state and community levels include adolescent males. We will work to identify opportunities for appropriate program expansion. Also, information about family planning counseling services is provided by PROMISE JOBS and the Family Development and Self-Sufficiency program.

**(B) Special Provisions**

**(i) The document shall indicate whether the State intends to treat families moving into Iowa from another state differently than other families under the program, and if so, how the State intends to treat such families under the program.**

Iowa has never treated families moving into Iowa from another state differently than other families under its TANF programs, even prior to the United States Supreme Court decision: Rita L. Saenz, Director, California Department of Social Services, et al., Petitioners v. Brenda Roe and Anna Doe, etc., 119 S.Ct. 1518 (1999), which prohibits such treatment.

**(ii) The document shall indicate whether the State intends to provide assistance under the program to individuals who are not citizens of the United States, and if so, shall include an overview of such assistance.**

The only program that Iowa has which meets the definition of "assistance" at 45 CFR 260.31 is the cash assistance provided under the Family Investment Program (FIP).

Eligible non-citizens of the United States will have FIP eligibility and benefits determined in the same manner as citizens. Legal qualified aliens who entered the U.S. before August 22, 1996, are eligible for FIP. Legal qualified aliens who enter the U.S. on or after August 22, 1996, are not eligible for FIP for five years following the date of entry except for those legal qualified aliens exempted from the five-year limitation by Title IV, Section 403, of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996.

For those ineligible for FIP cash assistance, the state will not provide comparable benefits unless directed to do so by the Iowa Legislature.

**(iii) The document shall set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how the State will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process.**

At this time, IDHS has retained policies and procedures for appeals that were in effect at the time that TANF was implemented in Iowa on January 1, 1997, as described in Title I, Chapter 7 of the Iowa Administrative Code and Title I, Chapter E of the Employees' Manual.

Clients have the right to appeal any decision and any adverse action taken by IDHS on their case and request a hearing. "Adverse actions" include the following:

- Denial of assistance.
- Delay in acting on the client's application within required time frames.
- Suspension, reduction or termination of assistance.
- Existence and the amount of an overpayment.
- Recovery of an overpayment.
- Appointment of a protective payee.

Aggrieved people may request a review of the Department's appeal decision or appeal the decision to the district court in the client's county of residence.

The Department has a written policy on nondiscrimination consistent with federal and state law that is included on applications, notices, and other forms. This policy includes information on where and how to file discrimination complaints.

**(iv) Not later than 1 year after the date of enactment of this Act, unless the chief executive officer of the State opts out of this provision by notifying the Secretary, a State shall, consistent with the exception provided in Section 407(e)(2), require a parent or caretaker receiving assistance under the program who, after receiving such assistance for two months is not exempt from work requirements and is not engaged in work, as determined under Section 407(c), to participate in community service employment, with minimum hours per week and tasks to be determined by the State.**

Iowa opted out of this provision. See Attachment A.1 for details.

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**(a)(2) CERTIFICATION THAT THE STATE WILL OPERATE A CHILD SUPPORT ENFORCEMENT PROGRAM. - A certification by the chief executive officer of the State that, during the fiscal year, the State will operate a child support enforcement program under the State plan approved under part D.**

As certified by the Governor in the attached State Plan Certifications, Iowa will operate a child support enforcement program approved under part D of the State plan.

**(a)(3) CERTIFICATION THAT THE STATE WILL OPERATE A FOSTER CARE AND ADOPTION ASSISTANCE PROGRAM. - A certification by the chief executive officer of the State that, during the fiscal year, the State will operate a foster care and adoption assistance program under the State plan approved under Part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State plan under title XIX.**

As certified by the Governor in the attached State Plan Certifications, Iowa will operate a foster care and adoption assistance program approved under Part E of the State plan and take actions as are necessary to ensure that children receiving foster care or adoption assistance are eligible for medical assistance under the Title XIX State plan.

**(a)(4) CERTIFICATION OF THE ADMINISTRATION OF THE PROGRAM. - A certification by the chief executive officer of the State specifying which State agency or agencies will administer and supervise the program referred to in paragraph (a)(1) for the fiscal year, which shall include assurance that local governments and private sector organizations**

**(A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and**

**(B) have had at least 45 days to submit comments on the plan and the design of such services.**

As certified by the Governor in the attached State Plan Certifications, the Iowa Department of Human Services (IDHS) is the State agency that will administer the program referred to in paragraph (a)(1).

Iowa began the TANF program effective January 1, 1997. Since the inception of TANF, Iowa has continued to seek advice from a Welfare Reform Advisory Group made up of representatives of county governments, local community organizations, business, labor, religious groups, state legislators, the general public, and several state agencies to achieve the objective in subparagraph (A). The Welfare Reform Advisory Group originally organized several broad-based work groups to focus on specific aspects of implementing federal TANF provisions. (See Attachment A which shows the work group structure.) Although the

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individual work groups no longer meet, the TANF program as it exists today is, in large part, a product of recommendations from those original work groups.

As certified by the Governor in Attachment B, local governments and private sector organizations have also been consulted and given 45 days to submit comments on the October 1, 1999, plan and design of Iowa's welfare services. Copies of the State plan will be available to the public at all IDHS offices and sent to county governments and certain service providers and organizations (see Attachment F for a list).

**(a)(5) CERTIFICATION THAT THE STATE WILL PROVIDE INDIANS WITH EQUITABLE ACCESS TO ASSISTANCE. - A certification of the chief executive officer of the State that, during the fiscal year, the state will provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government.**

As certified by the Governor in the attached State Plan Certifications, each member of an Indian tribe who is not eligible for assistance under a tribal family assistance program under Section 412 of the Social Security Act, as amended, shall have equitable access to the State program funded under this part by funds provided by the Federal Government.

**(a)(6) CERTIFICATION OF STANDARDS AND PROCEDURES TO ENSURE AGAINST PROGRAM FRAUD AND ABUSE. - A certification by the chief executive officer of the State that the State has established and is enforcing standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage.**

As certified by the Governor in the attached State Plan Certifications, Iowa has established and is enforcing standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State assistance program, kickbacks and the use of political patronage.

**(a)(7) OPTIONAL CERTIFICATION OF STANDARDS AND PROCEDURES TO ENSURE THAT THE STATE WILL SCREEN FOR AND IDENTIFY DOMESTIC VIOLENCE.**

**(A) IN GENERAL - At the option of the State, a certification by the chief executive officer of the State that the State has established and is enforcing standards and procedures to:**



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(i) screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;

(ii) refer such individuals to counseling and supportive services; and

(iii) waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.

**(B) DOMESTIC VIOLENCE DEFINED** - For purposes of this paragraph, the term 'domestic violence' has the same meaning as the term 'battered or subjected to extreme cruelty,' as defined in section 408(a)(7)(C)(iii).

Iowa is in the process of developing policies and procedures to implement this option in the Family Investment Program as required by state law adopted by the 1998 session of the Iowa General Assembly.

It has always been possible for FIP participants who are victims of domestic violence to receive counseling and supportive services. Staff involved with FIP, PROMISE JOBS, and child support recovery participants received training in how to screen and identify victims of domestic violence.

Additionally, policies and procedures are in development for notifying all FIP applicants and recipients about the availability of this option, including the possibility of good cause waivers for some FIP requirements (such as waivers of time limits, participation in certain work-related activities, and cooperation with child support) when compliance with such requirements would make it more difficult for the applicant or recipient to escape domestic violence or unfairly penalize those who are or have been victimized by such violence, or place the individual at risk of further domestic violence. People given waivers will need to agree to a safety plan to address or prevent family or domestic violence; the safety plan will be reviewed and updated periodically. Iowa will also make FIP available to immigrants who have been battered or subjected to extreme cruelty and who are eligible as legal qualified aliens under the provisions of 8 U.S.C. 1641(c). See certification in Attachment B.

Note: Iowa does not have a family cap provision. In addition, Iowa has never treated families moving into Iowa from another state differently than other families under its TANF programs, even prior to the United States Supreme Court decision: Rita L. Saenz, Director, California Department of Social Services, et al., Petitioners v. Brenda Roe and Anna Doe, etc., 119 S.Ct.

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1518 (1999), which prohibits such treatment. Waivers are therefore not applicable to these provisions.

**(b) PUBLIC AVAILABILITY OF STATE PLAN SUMMARY.** - The State shall make available to the public a summary of any plan submitted by the State under this section.

Iowa will make available to the public a summary of any plan submitted by the State under this section. (Also see response under paragraph (a)(4).)

#### **ADDITIONAL OPTIONAL REGULATORY PROVISIONS**

Code of Federal Regulations 45 CFR 265.9(b)(7) requires that the state in its annual report, or optionally in its State plan, provide:

**A description of the procedures the State has established and is maintaining to resolve displacement complaints, pursuant to section 407(f)(3) of the Act. This description must include the name of the State agency with the lead responsibility administering this provision and explanations of how the State has notified the public about these procedures and how an individual can register a complaint.**

The Iowa Department of Human Services has lead responsibility for administering this provision. The public is notified about procedures concerning displacement complaints through the publication of the Department's administrative rules in the Iowa Administrative Code (IAC). Procedures for filing and handling displacement complaints are found at IAC 441—93.144 and are attached (Attachment G).

Code of Federal Regulations 45 CFR 265.9(c)(9) requires that the state in its annual report, or optionally in its State plan, provide:

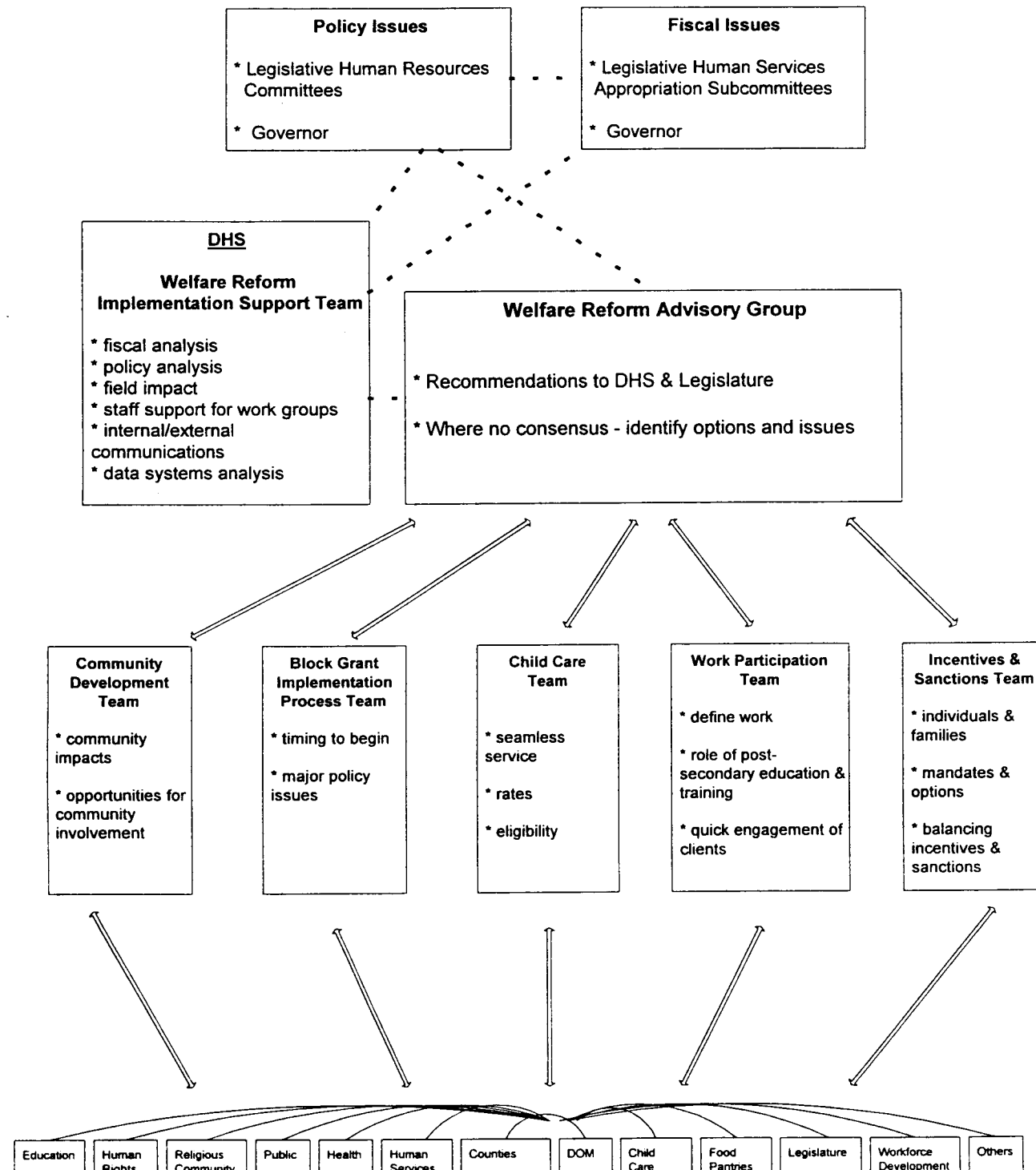
**A certification that those families for which the State is claiming MOE expenditures met the State's criteria for "eligible families".**

As certified by the Governor in the attached State Plan Certifications, the families for which Iowa is claiming maintenance of effort (MOE) expenditures meet the State's criteria for "eligible families" as defined in this State plan.

## ATTACHMENT A.1

### Attachment A

#### Personal Responsibility & Work Opportunity Reconciliation Act of 1996 Work Group Structure



#### NOTICE OF OPTING OUT OF THE COMMUNITY SERVICE PROVISION

This notice is given pursuant to Section 402(a)(1)(B)(iv) of the Social Security Act, as amended by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996. This is written notice that Iowa continues to choose to opt out of the provision that requires a parent or caretaker receiving assistance to participate in community service employment after receiving assistance for two months, when not exempt from work requirements and not engaged in work, as determined under Section 407(c).

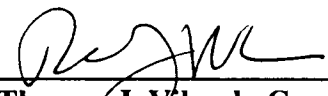
However, it is important to note the following:

- Iowa currently provides unpaid community service as an option of the Family Investment Agreement under the PROMISE JOBS program.
- Unpaid community service is appropriate as a method of gaining employability for recipients who are not able to immediately move into paid employment.
- It is appropriate to expect individuals to seek other work-related opportunities where paid employment is not available and unpaid community service is reasonable.
- It is possible that Iowa may expand the use of unpaid community service in the future or may make changes to mandate community service for certain recipients in the future.

However, mandating unpaid community service as provided in Section 402(a)(1)(B)(iv) of the Social Security Act does not appear to be consistent with Iowa's current Family Investment Program or as it may potentially be changed in the future. Therefore, I am notifying you of opting out of the provision at this time.

**CERTIFIED BY THE CHIEF EXECUTIVE OFFICER OF THE STATE:**

October 29, 1999  
Date

  
Thomas J. Vilsack, Governor  
State of Iowa



## ATTACHMENT B

### ◆ State Plan Certifications ◆

This has been designed to enable the Chief Executive Officer of a State to certify that the State will operate its Temporary Assistance for Needy Families (TANF) program in accordance with the statutory requirements in section 402(a)(2) through (7).

## CERTIFICATIONS

The State will operate a program to provide Temporary Assistance for Needy Families (TANF) so that children may be cared for in their own homes or in the homes of relatives; to end dependence of needy parents on governments benefits by promoting job preparation, work, and marriage; to prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and encourage the formation and maintenance of two-parent families.

This program is known as the Iowa Family Investment Program.

Executive Officer of the State: Thomas J. Vilsack, Governor, State of Iowa.

In administering and operating a program which provides Temporary Assistance for Needy Families with minor children under title IV-A of the Social Security Act, the State will:

1. Specify which State agency or agencies will administer and supervise the program under part A in all political subdivisions of the State.

The Iowa Department of Human Services is the agency responsible for administering the program.

2. Assure that local governments and private sector organizations:
  - (a) Will be consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and
  - (b) Will have at least 45 days to submit comments on the plan and the design of such services.
3. Operate a Child Support Enforcement program under the State plan approved under part D.
4. Operate a Foster Care and Adoption Assistance program in accordance with part E, and take all necessary actions to ensure that children receiving assistance are eligible for medical assistance.
5. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a Tribal Family Assistance plan approved under Section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government.

Certifications

6. Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest amount individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage.
7. Make available to the public a summary of the State plan.
8. Claim maintenance of effort (MOE) expenditures only for families that meet the State's criteria for "eligible families" as defined in this State plan.

**OPTIONAL CERTIFICATION**

[X ] The State has established and is enforcing standards and procedures to:

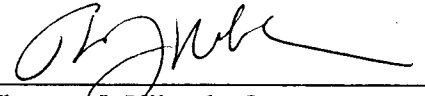
- (1) Screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;
- (2) Refer such individuals to counseling and supportive services; and
- (3) Waive, pursuant to a determination of good cause, other program requirements such as time limits (for as long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence. (Refer to (a)(7) of the TANF State Plan for detail on implementation of these waivers.)

Note: Iowa does not have a family cap provision. In addition, Iowa has never treated families moving into Iowa from another state differently than other families under its TANF programs, even prior to the United States Supreme Court decision: Rita L. Saenz, Director, California Department of Social Services, et al., Petitioners v. Brenda Roe and Anna Doe, etc., 119 S.Ct. 1518 (1999), which prohibits such treatment. Waivers are therefore not applicable to these provisions.

Certifications

**CERTIFIED BY THE CHIEF EXECUTIVE OFFICER OF THE STATE:**

October 29, 1999  
Date

  
\_\_\_\_\_  
Thomas L. Vilsack, Governor  
State of Iowa



**ATTACHMENT C**

**◆ Funding ◆**

FUNDING

Section 403(a)(1)(A) provides that each eligible State shall be entitled to receive for each of the federal fiscal years 1996 through 2002, a grant in an amount equal to the State family assistance grant as defined in section 403(a)(1)(B).

I. Payments to Agency Administering the TANF Program

- Payments for the TANF program will be made to the organization managing the AFDC/JOBS programs as of August 22, 1996, unless the State indicates that the TANF administering agency is changed. If a change is made, describe the name, address and EIN number of the new organization.

II. State Payments for TANF Program

- Section 405 requires that grants be paid to States in quarterly installments, based on State estimates. The State's estimate for each quarter of the fiscal year by percentage is:

For FY 1998 and Future Years-

<u>1st quarter</u>	<u>2nd quarter</u>	<u>3rd quarter</u>	<u>4th quarter</u>
25%	25%	30%	20%
_____	_____	_____	_____

- For FY 1997, States should indicate below the percentage of TANF funds requested for only those quarters in which they plan to operate the program.

For FY 1997

<u>1st quarter</u>	<u>2nd quarter</u>	<u>3rd quarter</u>	<u>4th quarter</u>
0%	30%	30%	25%
_____	_____	_____	_____

ATTACHMENT D

◆ Substantive Changes in State Plan ◆



## Substantive Changes in State Plan

This State plan is submitted as a “new” plan for purposes of renewing the state’s eligibility for federal funding under part A, Title IV, of the Social Security Act. Substantive changes to the prior State TANF plan are identified below.

1. This State plan provides information required by federal regulations at 45 Code of Federal Regulations (CFR) 263.2(b) effective October 1, 1999, as well as optional information that would otherwise be required in the state’s annual report under federal regulations at 45 CFR 265.9(b) and (c), as allowed under 265.9(d), also effective October 1, 1999. Information conforming with these regulations is incorporated throughout this State plan, typically within the descriptions of individual programs. Attachment E contains a full description of the individual regulatory cites above.
2. The state has terminated all waiver programs and corresponding treatment and control groups referenced in the prior State plan. Policies and procedures initially implemented under waivers have been incorporated into the state’s existing Family Investment Program (FIP) as described in this State plan.
3. The prior State plan incorporated, by reference, policies and procedures previously described in the state’s IV-A State plan under the Aid to Financially Dependent Children (AFDC) program formerly authorized under part A of Title IV of the Social Security Act and replaced by the Temporary Assistance for Needy Families (TANF) program. As this State plan is a “new” plan and replaces the prior State TANF plan, it includes more detailed information about policies and procedures about programs rather than referencing the old State AFDC plan.
4. The plan defines “needy family” for all programs described in the plan.
5. The plan incorporates the following changes in the FIP program:
  - Second cousins have been added to the list of “specified relatives” that a child may be living with to be eligible for FIP.
  - Nonincapacitated stepparents have been eliminated from the list of people that may be included in the eligible group.
  - Assigned child support is no longer used in determining financial eligibility for FIP.
  - The state no longer issues child support rebates to families on FIP.
  - Parents and caretakers receiving FIP are subject to a 25% grant reduction as a sanction for failing to cooperate in obtaining child support.
  - Children receiving FIP must attend school as required by state law. Families are subject to a 25% grant reduction if a child is determined to be truant without good cause.

## Substantive Changes

- The work transition period (a four-month disregard of earned income for certain long-term unemployed people) was eliminated .
  - The state now disregards all financial assistance for education and training as income and resources.
  - The FIP child care disregard (income deduction) was eliminated. FIP recipients and others whose income is considered are automatically eligible for state child care assistance.
  - FIP assistance for 2-parent households can be approved effective as early as 7 days after application.
  - Exemption from participating in PROMISE JOBS is granted only to people who are disabled and unable to participate.
  - The limited benefit plan for families that fail to sign a family investment agreement or carry out the terms of their agreement has been redesigned.
6. The plan describes coordination with Medicaid, Food Stamps and other assistance programs, including making policies consistent across programs.
  7. The plan includes descriptions of all programs operated in the state using federal TANF funds and state expenditures that can be claimed for maintenance of effort requirements. Descriptions include: program name, program purpose, program benefits and major activities provided to families, an indication if a program is intended to meet the third or fourth statutory purpose of TANF (prevent and reduce the incidence of out-of-wedlock pregnancies [3<sup>rd</sup> purpose] or encourage the formation and maintenance of two-parent families [4<sup>th</sup> purpose]), definition of an “eligible family” including household composition and financial criteria, and additional information as identified in Attachment E.
  8. The plan includes descriptions of the following programs:
    - Family Investment Program (FIP)
    - PROMISE JOBS Services
    - PROMISE JOBS Expense Allowances
    - Family Development and Self-sufficiency (FaDSS)
    - Post-employment
    - Iowa Transitional Assistance for Direct Education Costs (ITADEC)
    - Child Care Assistance
    - Housing-related Emergency Assistance
    - Parental Responsibility Pilot

#### Substantive Changes

- Diversion Programs
    - \*Pre-FIP Diversion
    - \*Community Self-sufficiency Grants (CSSG)
    - \*Family Self-sufficiency Grants (FSSG)
    - \*Post-FIP Diversion
  - IV-A Emergency Assistance (previously authorized under federal law prior to TANF)
  - Pregnancy Prevention
  - Family Planning
  - Individual Development Accounts (IDAs)
9. The plan describes transfers of TANF funds to the Social Services Block Grant (SSBG) and Child Care Development Fund (CCDF) as well as using TANF funds to match Job Access and Reverse Commute (JARC) grants.
10. The plan specifies that a single custodial parent caring for a child under age six and unable to obtain needed child care will not be subject to a limited benefit plan for failing to meet work participation requirements.
- The plan further provides the definitions and criteria required to be submitted by 45 CFR 261.56, effective October 1, 1999, to be used by the State TANF agency and State Child Care and Development Fund (CCDF) agency in determining when a single custodial parent with a child under age six has demonstrated an inability to obtain needed child care and is subsequently exempt from TANF work requirement sanctions.
11. The plan indicates that the state is adopting the domestic family violence option as provided by Section 402(a)(7) of the Social Security Act as amended by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996.
12. The plan includes a description of the procedures the State has established and is maintaining to resolve displacement complaints, pursuant to Section 407(f)(3) of the Social Security Act (see Attachment G).

## ATTACHMENT E

### ◆ Regulatory State Plan Elements ◆



## Regulatory State Plan Elements

Federal regulations effective October 1, 1999, provide for the following elements in the State TANF plan. All items below have been incorporated into this State plan.

### Required Elements.

45 CFR 263.2(b) requires that the state define "eligible family" for programs claimed for maintenance of effort purposes.

### Optional Elements.

- 1 CFR 261.56(b)(2)(iii) requires that the state submit the criteria and definitions it has developed to determine when a custodial parent with a child under age six has demonstrated an inability to obtain needed child care and is subsequently exempt from work requirement sanctions. Iowa is submitting this information in this State TANF plan.
- 2 As provided for by 45 CFR 265.9(d), the state is opting to include the following elements in this State plan as an alternative to providing this information in its annual report:
  - 45 CFR 265.9(b) Each State must provide the following information on the TANF program: The numbering below corresponds to the specific numbered items from 265.9(b) that are addressed in this State plan.
    - (1) The State's definition of each work activity;
    - (2) A description of the transitional services provided to families no longer receiving assistance due to employment;
    - (3) A description of how a State will reduce the amount of assistance payable to a family when an individual refuses to engage in work without good cause pursuant to 45 CFR 261.14;
    - (5) If the State has adopted the Family Violence Option and wants Federal recognition of its good cause domestic violence waivers under subpart B of part 260 of this chapter, a description of the strategies and procedures in place to ensure that victims of domestic violence receive appropriate alternative services
    - (6) A description of any nonrecurrent, short-term benefits provided, including: (i) The eligibility criteria associated with such benefits, including any restrictions on the amount, duration, or frequency of payments; (ii) Any policies that limit such

## Regulatory Elements

payments to families that are eligible for TANF assistance or that have the effect of delaying or suspending a family's eligibility for assistance; and (iii) Any procedures or activities developed under the TANF program to ensure that individuals diverted from assistance receive information about, referrals to, or access to other program benefits (such as Medicaid and food stamps) that might help them make the transition from welfare to work;

(7) A description of the procedures the State has established and is maintaining to resolve displacement complaints, pursuant to section 407(f)(3) of the Act. This description must include the name of the State agency with the lead responsibility for administering this provision and explanations of how the State has notified the public about these procedures and how an individual can register a complaint;

(8) A summary of State programs and activities directed at the third and fourth statutory purposes of TANF (as specified at Sec. 260.20(c) and (d) of this chapter).

- 45 CFR 265.9(c) Each State must provide the following information on the State's program(s) for which the State claims MOE expenditures: The numbering below corresponds to the specific numbered items from 265.9(c) that are addressed in this State plan.

(1) The name of each program and a description of the major activities provided to eligible families under each such program;

(2) Each program's statement of purpose;

(3) If applicable, a description of the work activities in each separate State MOE program in which eligible families are participating;

(6) The eligibility criteria for the families served under each program/activity;

(7) A statement whether the program/activity had been previously authorized and allowable as of August 21, 1996, under section 403 of prior law;

(8) The FY 1995 State expenditures for each program/activity not authorized and allowable as of August 21, 1996, under section 403 of prior law (see Sec. 263.5(b) of this chapter); and

(9) A certification that those families for which the State is claiming MOE expenditures met the State's criteria for "eligible families".

## **ATTACHMENT F**

### **◆ Input From Local Governments and Private Sector Organizations ◆**

#### **Input From Local Governments and Private Sector Organizations**

Pursuant to Section 402(a)(4) of the Social Security Act as amended by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193), copies of this State plan have been provided to the following entities who were allowed 45 days to submit comments. In addition, copies of this plan are available to the public at all local Department of Human Services (DHS) offices.

- \* Council on Human Services
- \* Iowa Workforce Development
- \* Iowa Department of Economic Development
- \* Iowa Department of Health
- \* Sac & Fox Tribal Offices
- \* Iowa Chapter of the National Committee to Prevent Child Abuse
- \* Iowa Woman's Political Caucus
- \* Public Policy Services
- \* Cottage Grove Presbyterian Church
- \* Iowa Comprehensive Human Services
- \* Iowa Community Action Association
- \* Des Moines Coalition of Homeless
- \* Jones County Family Resource Association
- \* State Legislative Caucus Staff
- \* Institute for Social & Economic Development
- \* Iowa Human Needs Advocates
- \* Planned Parenthood
- \* Child Care Coalition
- \* Child & Family Policy Center
- \* National Assoc. of Social Workers
- \* Community Empowerment Coordinator
- \* University of Iowa School of Social Work
- \* Legal Services Corporation of Iowa
- \* Legal Aid Society of Polk County
- \* Welfare Reform Advisory Group (see Attachment A for membership)
- \* Welfare Reform Advisory Group Meeting Attendees
- \* County Boards of Supervisors

## ATTACHMENT G

### ◆ Procedures for Displacement Complaints ◆

#### Procedures for Displacement Complaints

Following is a description of the procedures in place for addressing displacement complaints as required by 45 Code of Federal Regulations (CFR) 265.9(b)(7).

**441—93.144(239B) PROMISE JOBS grievance procedure.** The PROMISE JOBS program shall provide a grievance procedure to address and resolve public complaints regarding the displacement of regular workers with program participants.

**93.144(1)** The procedure will provide that:

- a* Complaints must be filed in writing and received by the PROMISE JOBS contractee within one year of the alleged violation.
  - b* A representative of the PROMISE JOBS contractee must schedule a face-to-face interview with the complainant within seven days of the date the complaint is filed, to provide the opportunity for informal resolution of the complaint.
  - c* Written notice of the location, date and time of the face-to-face interview must be provided.
  - d* An opportunity must be provided to present evidence at the face-to-face interview.
  - e* The representative of the PROMISE JOBS contractee shall issue a decision in writing within 14 days of the date a complaint is filed.
  - f* A written explanation must be provided to all involved parties of the right to file a written appeal, according to 441—Chapter 7, if the opportunity for informal resolution is declined, if a party receives an adverse decision from the PROMISE JOBS contractee, or if there is no decision within the 14-day period.
- (1) To be considered, an appeal must be filed with the department within ten days of the mailing date of the adverse decision or ten days from the date on which a decision should have been mailed.
- (2) An appeal hearing will not be granted until informal resolution procedures have been exhausted, unless a decision has not been issued within 24 days of the complaint filing date.

**93.144(2)** The department shall issue a final decision within 90 days of the date the complaint was filed with the PROMISE JOBS contractee.

**93.144(3)** Any dissatisfied party shall be informed of the right to appeal the decision of the department to the Secretary of Labor at Office of Administrative Law Judges, U.S. Department of Labor, Vanguard Building, Room 600, 111 20th Street N.W., Washington, DC 20036, within 20 days of the receipt of the department's final decision. For the purposes of this rule, the department's final decision shall be considered received the second day after the date that the written decision was mailed, unless the intended recipient can demonstrate that it was not received on the second day after the mailing date. When the second day falls on a Sunday or legal holiday, the time shall be extended to the next mail delivery date. The option to appeal to the Secretary of Labor does not preclude an individual from exercising any right to judicial review as provided in Iowa Code chapter 17A or as described in 441—Chapter 7.



**Displacement Procedures**

**93.144(4)** Upon notice of a complaint or grievance, the PROMISE JOBS office must provide the complaining party with a copy of the grievance procedures, notification of the right to file a formal complaint and instruction on how to file a complaint.

**93.144(5)** Upon filing a complaint, and at each stage thereafter, each complainant must be notified in writing of the next step in the complaint procedure.

**93.144(6)** The identity of any person who has furnished information relating to, or assisting in, an investigation of a possible violation must be kept confidential to the extent possible, consistent with due process and a fair determination of the issues.

**93.144(7)** All employers who participate in the PROMISE JOBS program shall provide assurances that all regular employees are aware of this grievance procedure.

**Please send comments to:**

**TANF State Coordinator  
Department of Human Services  
Economic Assistance  
Hoover State Office Building, 5th Floor  
Des Moines, Iowa 50319-0114**

