

STATE OF IOWA

STATE PLAN FOR TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

EFFECTIVE OCTOBER 1, 2019

Iowa's TANF State Plan was developed in accordance with Section 402 of the Social Security Act, as amended by the Patient Protection and Affordable Care Act of 2010 (P.L. 111-148) and the Middle Class Tax Relief and Job Creation Act of 2012 (P.L. 112-96). This TANF State Plan is submitted as a new plan for the purpose of maintaining Iowa's eligibility for federal funding under part A, Title IV, of the Social Security Act. Substantive changes to the prior TANF State Plan are identified in Attachment D. The information submitted herein restates the pertinent requirements of Section 402 and outlines the provisions of Iowa's program with respect to each requirement.

This TANF State Plan also provides information required by 45 Code of Federal Regulations (CFR) 263.2(b) and 265.9(b)(11), effective October 1, 2019, as well as optional information that would otherwise be required in Iowa's Annual Report under 45 CFR 265.9(b) and (c), as allowed under 265.9(d), also effective October 1, 2019. Specifically, this TANF State Plan:

1. Provides information specified in 45 CFR 265.9(b)(1), (2), (3), (5) [excluding aggregate numbers of good cause domestic violence 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 in 45 CFR 265.9(c)(1), (2), (3), (6), (7), (8), and (9). Information conforming to these regulations is incorporated throughout this TANF State Plan, typically within the descriptions of individual programs. Attachment E contains a full description of the individual regulatory citations.

2. Provides information specified in 45 CFR 265.9(b)(10):

(10) A comprehensive description of the state's policies and practices to prevent assistance (defined at § 260.31(a) of this chapter) provided with federal TANF or state TANF MOE funds from being used in any electronic benefit transfer transaction in any: liquor store; casino, gambling casino or gaming establishment; or retail establishment which provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.

A general description of the state's policies and practices is found in the main body of this State Plan while details are found in Attachment J and its exhibits.

3. Complies with 45 CFR 265.9(b)(11) requiring that the state's TANF Plan must describe how the state will:

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- (i) Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12) of the Act, including a plan to ensure that recipients of the assistance have adequate access to their cash assistance; and

As noted under item 2, a general description of the state's policies and practices is found in the main body of this State Plan while details are found in Attachment J and its exhibits.

- (ii) Ensure that recipients of assistance provided under the State program funded under this part have access to using or withdrawing assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available.
4. Pursuant to 45 CFR 261.56, includes the criteria and definitions used by Iowa 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 penalty for failure to meet required work requirements.

ADMINISTRATION

Iowa Department of Human Services

The Iowa Department of Human Services (DHS) has primary responsibility for administering the state's TANF block grant. This includes the Family Investment Program (FIP) cash assistance and other programs funded in whole or in part with TANF or state maintenance of effort (MOE) funds. The DHS is the single state TANF agency and is responsible for providing a broad array of services. Public assistance programs administered by the DHS include: institutional and community-based programs; mental health resources, including psychiatric hospitals and hospital schools for persons with an intellectual disability; and programs delivered by local offices, which are responsible for most of the direct services provided, including those covered by Title IV-A. The DHS is responsible for the timely completion and submittal of all quarterly and annual TANF reports.

The DHS contracts with the Iowa Department of Inspections and Appeals (DIA) to conduct appeal hearings, eligibility investigations and recovery of overpayments. However, the DHS does not delegate authority to the DIA to exercise administrative discretion for supervision of the TANF State Plan or to issue program policies, rules or regulations. The DIA contract personnel are not DHS employees. To the extent that they perform DHS work, they are agents and representatives of the DHS.

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The DHS contracts with the Iowa Department of Workforce Development (IWD) to provide PROMISE JOBS services – work and training for TANF cash assistance recipients. The DHS Bureau of Refugee Services provides PROMISE JOBS services for individuals with limited English proficiency.

The DHS is headed by a Director selected by the Governor and confirmed by the state Senate. A Council on Human Services acts in an advisory capacity to the DHS on making departmental policy. Council members are appointed by the Governor and confirmed by the Senate. The Deputy Director, as well as Division Administrators, are appointed by the DHS Director and are not subject to a set term in office.

Department of Human Rights

Effective July 1, 2007, the Iowa Department of Human Rights (IDHR), Division of Community Action Agencies, became a TANF sub grantee responsible for administering the Family Development and Self-Sufficiency (FaDSS) program funded with TANF and state MOE dollars. (See later program description of FaDSS.)

Effective July 1, 2019, the IDHR implemented the **FaDSS Program for Non – FIP Families** to provide FaDSS services to families not eligible for FaDSS program services described under **Family Investment Program (FIP) Related Programs**. (See later program description under **Other TANF or State Only Funded Programs**.)

The IDHR consists of the following:

Divisions	Offices
Community Action Agencies	Asian and Pacific Islanders
Criminal and Juvenile Justice Planning	Deaf Services
Community Advocacy and Services	Latino Affairs
	Native Americans
	Persons with Disabilities
	Status of African Americans
	Status of Women

The Governor appoints and the Senate confirms the Director, who in turn appoints each Division Administrator. Each Division and Office has a Commission or Council appointed by the Governor and responsible for: studying opportunities for and the changing needs of underrepresented populations; serving as liaison between the IDHR and the public; recommending adoption of administrative rules; and recommending legislative and executive action to the Governor and General Assembly.

SECTION 402 [42 U.S.C. 602] – STATE PLAN REQUIREMENTS

(a) IN GENERAL. As used in this part, the term “eligible State” means, with respect to a fiscal year, a State that, during the 27-month period ending with

the close of the 1st quarter of the fiscal year, has submitted to the Secretary a plan that the Secretary has found includes the following:

(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 TANF State Plan under Other TANF and Segregated or Separate State Programs used for MOE.

Iowa's Family Investment Program (FIP)

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

Major welfare reform in Iowa began in 1993 when legislation passed by the Iowa General Assembly authorized the Iowa Department of Human Services (DHS) to seek a series of federal waivers to the Aid to Families with Dependent Children (AFDC) program 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 the DHHS in 1993. As a result, the waivers were terminated via correspondence to the DHHS dated July 18, 1997.

Policies and procedures for FIP are described in Chapter 239B of the Code of Iowa, Titles IV and IX of the Department's section of the Iowa Administrative Code (IAC), and Title 4 of the DHS Employees' Manual. The public may view the Employees' Manual upon request.

Major changes in FIP policy that have occurred since the last TANF State Plan are identified as such throughout this document, including a description and effective date of each change.

Goals and objectives of Iowa's Family Investment Program:

- Provide an incentive to work and make work pay, leading families to self-sufficiency.
- Encourage family stability and the formation of families.
- 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 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. Measurements of success focus on earned income increases and whether families are leaving and remaining off FIP.

Eligibility Requirements:

FIP 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 a comparable program before reaching age 19. A child under age 18 is eligible for assistance without regard to school attendance. A child aged 16 through 18 who does not attend school full-time must cooperate with PROMISE JOBS and complete a Family Investment Agreement (FIA) as described in (ii). A child becomes an adult when the child marries, unless the marriage is annulled.
2. Eliminated effective January 2001: deprived of parental support or the 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.

Based on the number of people in the eligible group, the income of FIP applicants and recipients must be within the following limits:

Gross Monthly Income Limits:				
1) \$ 675.25	3) \$1,570.65	5) \$2,020.20	7) \$2,469.75	9) \$2,915.60
2) \$1,330.15	4) \$1,824.10	6) \$2,249.60	8) \$2,695.45	10) \$3,189.40
Add \$320.05 for each additional person.				
Net Monthly Income Limits:				
1) \$183	3) \$426	5) \$548	7) \$670	9) \$791
2) \$361	4) \$495	6) \$610	8) \$731	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. Effective August 1, 2007, the earned income disregard was increased from 50 percent to 58 percent in order to enhance the benefit of working.

Resource limits are \$2,000 for applicant families and \$5,000 for recipient families. The value of one motor vehicle is disregarded from inclusion in the calculation of family resources.

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:

- 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 age/school attendance requirements and, until January 2001, deprivation 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, beyond three months, 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.
- Each member of the eligible group must be a citizen or qualified alien.
 - Each member must be a resident of Iowa.
 - Each member must have a social security number or proof of application for a number.
 - The parent or caretaker must assign all rights to support to the Iowa Department of Human Services (DHS) and must cooperate in obtaining support.
 - Effective February 1998, assigned child support retained by the state is not used to determine ongoing Family Investment Program (FIP) eligibility.
 - Effective March 1998, a 25 percent grant reduction is imposed when the parent or caretaker fails to cooperate in obtaining support unless good cause for not cooperating is established.
 - Effective July 1998, Iowa totally phased out a child support rebate provided to FIP recipients.
 - Each member must apply for and accept benefits from certain other sources, if eligible. Beginning July 2002, every person in the eligible group and any parent living in the home of a child on FIP must apply for Supplemental Security Income (SSI) when:
 - The claimed disability is expected to last continuously for 12 months or is expected to result in death; or
 - The person is aged 65 or older; or
 - The person is blind.

As of July 2002, the entire eligible group is ineligible for FIP if the person refuses to apply for or accept social security or SSI benefits.

- All mandatory PROMISE JOBS participants must cooperate with PROMISE JOBS and complete a Family Investment Agreement (FIA) as described in (ii) as a condition of eligibility.
 - All households filing an application for FIP program benefits on or after November 1, 2004, must have an FIA signed before FIP approval, as a condition of eligibility.

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- If a parent fails to sign an FIA, the entire family is ineligible for FIP.
 - If a referred person who is not a parent fails to sign an FIA, only that person is ineligible.
- Effective September 2004, any family that contains a member enrolled in an educational program leading to a degree **beyond** a bachelor's degree is not eligible for FIP.
- Each member must cooperate with the Iowa Department of Inspections and Appeals (IDIA) when referred by the DHS for investigation.
- When the parent of the dependent child is under age 18, never married (or the marriage was annulled), the minor parent must live with an adult parent or a legal guardian, or establish good cause for not living with an adult parent or legal guardian.
- People whose needs are met by any other public assistance program administered by the DHS or another state, including IV-E or state-funded foster care, or who receive SSI, must be excluded from the eligible group.
- People participating in a strike are ineligible. If the striker is a parent, the entire family is ineligible.
- Iowa will not use TANF or state maintenance of effort (MOE) funds to provide FIP to any family that has received FIP assistance for 60 months (whether or not consecutive) as described at 45 CFR 264.1(a) and (b), unless the family qualifies for an extension under the option described at 45 CFR 264.1(c).
 - In the case of a child living with a parent or the parent's spouse, the entire family that does not qualify for an extension is ineligible for FIP after the parent or spouse has received FIP for 60 months.
 - In the case of a child living with a non-parental caretaker relative, the non-parental caretaker relative, who is not eligible for an extension, is removed from the FIP grant after receiving FIP for 60 months, but the caretaker may continue to receive FIP for the child.

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 60 months and extension

provisions do 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 state 60-month limitation even when the parent's needs are not included in the FIP grant. Therefore, the entire family that does not qualify for an extension is ineligible for FIP after the parent has received FIP for 60 months regardless of whether the parent is or is not on the grant. However, any month that the parent receives Supplemental Security Income (SSI) or is eligible for the exemption described at 45 CFR 264.1(b)(1)(ii) does not count against the 60-month limit.

- An extension of the 60-month limit requires meeting the following criteria:
 - a. There must be a barrier, that is, an experience or situation preventing the family from being self-supporting.
 - b. The barrier may be the result of a past or current experience or situation that affects current functioning. Current experience may include fear of an event that may or is likely to occur in the future.
 - c. A family may request an extension when the barrier impacts the family's ability to become self-sufficient; the family is willing to make incremental steps towards that goal; and the family is participating to their maximum potential.
 - d. A family with an FIA-responsible person must be actively making incremental progress towards self-sufficiency in ways that will address the barrier(s) identified for the extension.

- A family must provide supporting evidence of the hardship barrier and the impact of the barrier on the family's ability to leave FIP.

- A family may request an extension after receiving 58 months of FIP. The extension cannot be granted until the family has reached its 60-month limit. The DHS income maintenance worker decides if the family is eligible for an extension.

- If a family with an FIA-responsible person is found eligible to receive FIP beyond 60 months, the family and PROMISE JOBS worker together write an FIA for a six-month extension period. There is no limit on the number of six-month extension periods that a family may request, so long as the family continues to meet hardship criteria.

- The FIP goal of personal responsibility was strengthened in January 2007, through an Administrative Rule change that clarified that when a participant is offered PROMISE JOBS activities to overcome a known barrier to self-sufficiency and fails to comply, the participant does not meet hardship criteria to receive FIP beyond 60 months based on that specific barrier.
- For purposes of calculating the 20 percent limit on the number of families allowed an extension to the federal time limit, the state uses the average monthly number of families receiving assistance during the current federal fiscal year. Included in the 20 percent are families that have their FIP benefits continued beyond 60 months while an appeal is pending and other situations where the benefits are subject to overpayment recovery, such as when benefits are continued pending the issuance of timely notice.
- Effective February 1, 2014, as a condition of on-going eligibility, FIP recipients are prohibited from accessing benefits through electronic benefit transactions at automated teller machines or point-of-sale devices at locations specified in Section 408(a)(12) of the Social Security Act. See Section a.(1)(A)(vii) for details.

Calculating the Grant:

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 and self-supporting parents of a minor parent) after appropriate disregards, must meet Iowa's income tests. The income and resources of SSI recipients 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.

- The FIP adult care disregard was eliminated March 1, 2000.
- All income received by temporary Census Bureau workers is disregarded.
- Effective August 1, 2007, the earned income disregard was increased from 50 percent to 58 percent.

Program Benefits, Funding, and Method of Payment:

The assistance grant is issued monthly, and may include a separate payment for special needs. Since November 2009, all payments have been issued through an electronic access card (EAC) except when the recipient requests direct deposit; or the DHS determines it is not practical to issue the payment by EAC.

FIP assistance may be effective as early as seven days from the date of application for any family (including two-parent households since January 1998) who otherwise meets all eligibility requirements.

Iowa's cash assistance programs are available statewide. The FIP program is funded with commingled TANF and state maintenance of effort (MOE) funds. Iowa's Family Investment Program (FIP) for Battered Aliens and Two-Parent Families Receiving FIP are funded solely with segregated state MOE funds.

Coordination with Medicaid, the Supplemental Nutrition Assistance Program (SNAP), and Other Programs

The DHS 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 the Supplemental Nutrition Assistance Program (called Food Assistance in Iowa). Staff working with Iowa's FIP programs actively coordinate with Medicaid and Food Assistance and other activities to ensure that families receive benefits to which they are entitled.

As described below, the DHS makes a concerted effort to develop or revise policies and procedures that encourage consistency between the various programs.

- Effective September 1999, FIP program policy was changed to match policy in the Iowa Food Assistance Program, and to the extent possible in the Medicaid program, in the following areas:

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- treatment of late review forms;
 - failure to timely report changes;
 - recurring lump sums;
 - earnings in-kind; and
 - non-homestead property.
- Effective October 1, 2002, Food Assistance policy was changed to no longer consider educational income a resource.
- Effective November 2003, the DHS implemented privacy policies to align with the Health Insurance Portability and Accountability Act (HIPAA) of 1996. The following two HIPAA policies were extended to all DHS programs:
 - Workforce members who are crime victims may disclose confidential information to law enforcement for identification and location purposes.
 - DHS staff may refuse to treat a person as a personal representative if staff have a reasonable belief that doing so could endanger the DHS customer, such as a person who has subjected, or may subject a DHS customer to domestic violence.
- Effective July 2004, the Iowa Food Assistance Program changed policy to exclude, without regard to its value, one motor vehicle per household.
- Effective January 2007, the DHS implemented the following changes in FIP policy to align with Food Assistance or Medicaid program policies. These changes improve administrative efficiency, eliminate confusion and provide better customer service for participants.
 - The method of determining the FIP monthly grant amount was changed from retrospective budgeting (setting the next month's grant according to a prior month's income) to prospective budgeting (setting the amount based on anticipated income).
 - The list of changes participants are required to report for FIP was revised to make it easier for participants to understand what information must be reported, and allow DHS staff to focus on obtaining the information that is necessary to correctly determine eligibility and benefits.
 - Recoupment does not apply when a change in income is timely reported and timely acted upon by the local office, but the DHS' timely notice requirements delay the action until the second calendar month following the month of change and eligibility for

FIP continues. This change prevents imposition of small overpayments incurred through no fault of the participant or the worker.

The DHS continues to recoup any excess benefits issued when a participant fails to timely report a change in circumstances or when a change makes a case or a person ineligible for FIP but the DHS' timely notice requirements delay the action.

- The period of ineligibility caused by receipt of a nonrecurring lump sum was changed to align with Medicaid policy to encourage timely reporting the receipt of a nonrecurring lump sum.

The period of ineligibility begins with the month when the nonrecurring lump sum is received. If the lump sum is timely reported, but timely notice provisions prevent applying it to one or both of the first two months of the period of ineligibility, no recoupment will be made for those months. If the lump sum is not timely reported, recoupment will be made.

- The substitution of a telephone interview for a face-to-face interview at the time of application or review is allowed, as appropriate. Allowing income maintenance workers the flexibility to do FIP interviews by telephone promotes efficiency for workers while removing a barrier for families who have difficulty attending a face-to-face interview. A family may have difficulty attending a face-to-face interview because of work or school schedules, lack of transportation, lack of child care, health problems, or other issues.
- Effective August 2007, the DHS increased the earned income disregard for Medicaid from 50 percent to 58 percent to align with FIP policies.
- Effective February 1, 2009, the DHS eliminated FIP quarterly reporting and moved to semi-annual reporting. This change aligns FIP reporting requirements with Food Assistance, resulting in less customer confusion and paperwork.

As described in the **ADMINISTRATION** section of this State Plan, the DHS is the single state TANF agency and responsible for administering numerous public assistance programs to help lowans achieve healthy, safe, stable, and self-sufficient lives. These include both "needs-based" programs such as TANF cash assistance, the Supplemental Nutrition Assistance Program (SNAP), child care assistance, and medical assistance, as well as programs

available without regard to financial need, typically concerning child welfare services. As also described in this Plan, Iowa uses TANF and state MOE funds to support many of these programs (subject to limitations) to meet one or more TANF purposes. Iowa invests a significant portion of its annual TANF award in child care assistance and child welfare programs.

The DHS' scope of responsibility and diverse use of TANF funds result in programs that serve both adults and children, often focusing more on one than the other, but also sometimes addressing the needs of both. From an agency perspective as well as from a TANF funding perspective, the DHS provides many essential "Two-Generation Services." The DHS' structure and flexible uses of TANF funds allows these services to be provided in a more integrated manner.

OTHER TANF AND SEGREGATED OR SEPARATE STATE PROGRAMS USED FOR MAINTENANCE OF EFFORT

The following is a list of Iowa programs, other than FIP, that use TANF, state maintenance of effort (MOE) funding or both. Segregated or Separate State Programs used for MOE are identified below. Except for those programs below that are specifically identified as using only state funds, each program listed uses either all TANF funds or commingled TANF and state MOE funds.

All programs, benefits, and services for which state funds may be claimed for MOE purposes under Section 409(a)(7) of the Social Security Act, 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 (FIP) cash grant assistance is considered "assistance" within the federal TANF definition and, consequently, counts toward a family's federal 60-month lifetime limit. However, by state law, the same definition of "assistance" is used for two Segregated State Programs; Two-Parent Families Receiving FIP and FIP for Battered Aliens, and benefits under either program count toward a family's state 60-month lifetime limit.

Citizenship, eligible alien status, and social security number requirements apply to:

- FIP;
- Two-Parent Families Receiving FIP;
- FIP for Battered Aliens; and
- All other 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.

Family Investment Program (FIP) Related Programs:

- **Two-Parent Families Receiving FIP:**

This Segregated State Program uses only state funds to provide FIP benefits to two-parent families when both parents receive FIP. All FIP and PROMISE JOBS program provisions, including Iowa's 60-month limit on the receipt of assistance, apply to persons in this program.

State funds expended for this program are used to meet TANF MOE 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 Investment Program for Battered Aliens:**

This Segregated State Program uses only state funds to provide cash assistance grants to immigrants who have been battered or subjected to extreme cruelty and are eligible as qualified aliens under the provisions of 8 U.S.C. 1641(c), but have not resided in the U.S. for at least five years. Immigrants receiving FIP for Battered Aliens benefits would otherwise have been eligible for regular FIP except for the application of Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996.

By state law, participants of FIP for Battered Aliens are subject to all of the same program requirements as regular FIP participants, including participation in PROMISE JOBS and the 60-month time limit.

Battered immigrants who have received an approved or pending petition for prima facie case for immigration status (form I-360), but are in a waiting period to be allowed to apply for a social security number may be considered eligible. Qualified battered immigrants who do not have a social security number must apply for work authorization, and once that is received, must apply for a social security number.

Qualified battered immigrants must provide proof of application for a social security number by the month following the month when the employment authorization is received. They must report and provide the social security number once it is received.

Receipt of FIP for Battered Aliens program benefits does not grant eligibility for the Supplemental Nutrition Assistance Program (SNAP), known as Food Assistance in Iowa or for medical benefits, beyond the extent already allowed by federal or state law.

- **PROMISE JOBS Services:**
This program provides work and training services to FIA-responsible persons in families eligible for regular FIP cash assistance or for Two-Parent Families Receiving FIP. Refer to (ii) for a description of family members eligible for services. PROMISE JOBS provides employment, post-employment, and training activities through the FIA.
- **PROMISE JOBS Services for Excluded Parents and Battered Aliens:**
Effective October 2006, this Separate State Program provides work and training services for FIA-responsible persons participating in the FIP for Battered Aliens cash assistance program and for excluded FIP parents. Refer to (ii) for a description of family members eligible for services. PROMISE JOBS provides employment, post-employment, and training activities through the FIA.
- **PROMISE JOBS Expense Allowances:**
This Separate State Program provides the following supports to persons in the PROMISE JOBS program when the activity is approved under the FIA:
 1. Transportation; except for employment. Participants who are employed are entitled to the FIP work expense deduction to cover transportation costs associated with employment;
 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. Birth certificates when needed to register for work; and
 5. Safety equipment.

The state funds expended for this program qualify as TANF MOE as they meet the criteria of 409(a)(7)(B)(i)(I) and (II) of Title IV-A of the Social Security Act.

- **Family Development and Self-Sufficiency (FaDSS) Program for FIP Families:**

This program provides intensive in-home family development services to families receiving FIP and identified as having multiple or severe barriers to self-sufficiency and family stability. FaDSS participants leaving FIP can continue to receive transitional services for a seven-month period to progress toward permanent self-sufficiency. Former FIP recipients receiving FaDSS services are deemed eligible based on meeting the

State's income and resources criteria applicable to their receipt of FIP cash assistance. The Iowa Department of Human Rights, Division of Community Action Agencies, administers this program. The program is available statewide and services are provided by contracted agencies.

FaDSS intensive in-home family development services include the following core components:

- Home visits that include all family members when appropriate.
- Assessments specific to the whole family, parents and children in the home. (Examples of assessments are Family Self –Sufficiency Matrix, Relationship Assessment Tool, Ecomap, Measure of Family Well- Being, AC-OK Screen for Co-Occurring Disorders, ASQ-3, ASQ-SE3 and Casey Life Skills.)
- Goal setting to help the family develop short and long-term goals centered on self-sufficiency and family stability needs. Goals are developed that are whole family, parent and child- focused.
- Referrals to help families access community resources to overcome barriers and to access opportunities within their communities. Referrals are made for all family members based on the need of the individual.
- Support, which is ongoing, strength-based and focused on solutions. The family development specialist builds a trusting and respectful relationship with the entire family which enables the program to work alongside the family to assist them in meeting their goals.
- Advocacy, to help families develop self-advocacy skills through modeling and empowerment to ensure services are equitable, inclusive and responsive to the whole family.
- Group activities to break isolation, encourage networking and help families reconnect to their community. Family, parent and child focused groups are being planned.
- Flexible funding, whereby FaDSS provides funds (as available) for supportive services to address a family's particular needs when other resources are not available. These funds can be for whole family, parent or child needs. (Very few grantees have flexible funding. If they have funds, the grantee does not give funds directly to the family; they pay the vendor on behalf of the family. These funds are only used if the family can't secure other resources within the community.)

Services are customized to meet the unique needs of each family and provided to all family members as necessary and appropriate.

- **FIP Diversion Program:** discontinued effective July 1, 2009.

- **Family Self-Sufficiency Grants (FSSG):**

Available statewide, this program helps PROMISE JOBS participants address specific barriers to self-sufficiency. The grants are designed to pay for products or services that are necessary for the PROMISE JOBS participant to obtain or retain employment and that are not available through other sources. It must be reasonably anticipated that a payment will assist the family to retain or obtain employment in the two full calendar months following the payment authorization date.

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 regular PROMISE JOBS policies. Local plans differ in the benefits or services offered to recipients. Examples include:

- Car repair or maintenance
- Relocation costs
- Occupational/professional licensure/testing fees
- Utility assistance
- Housing assistance
- Transportation assistance other than car repair
- Job interview clothing or special clothing related to a job (e.g., boots)
- Tools & equipment for employment
- Other miscellaneous costs, including but not limited to: grooming/personal care, alarm clock, watch, calendar/day planner, salon services, and hygiene products)

Limit on assistance.

The total payment limit per family is \$1,000 per year, meaning the 12 fiscal months following the date of authorization of the initial payment for the family. A fiscal month can begin and end in different calendar months.

Frequency of assistance.

FSSG is intended to provide immediate and short-term assistance. While a family may be a candidate more than once and may receive payments in consecutive months in some circumstances, payments shall not be established as regular or ongoing.

Supplanting.

FSSG shall not be used for services already available through the DHS, PROMISE JOBS, or other local resources at no cost.

- **Child Care Assistance limited to FIP households – see next subsection.**

Child Care Assistance:

For the purposes of TANF, Iowa uses both TANF and state maintenance of effort (MOE) funds for child care assistance. The actual composition of funding is dependent upon state financial needs and may change from year-to-year.

- **State Child Care Assistance Previously Authorized:**

This Separate State Program (SSP) provides state funding for child care expenditures previously authorized and allowable under the former Child Care for AFDC recipients and At-Risk Child Care programs and is limited to families eligible for the Family Investment Program. Expenditures in their entirety may be claimed as MOE pursuant to 45 CFR 263.5(a).

Child care assistance under this program is provided to FIP families without regard to their employment status. Child care for unemployed FIP families is considered to be “assistance” in accordance with 45 CFR 260.31. For purposes of determining work participation rates under 45 CFR Part 261 – ENSURING THAT RECIPIENTS WORK, including the calculation of any caseload reduction credit, because these families must be receiving FIP and included in any TANF caseload count for these purposes, these families are excluded from any Separate State Program caseload count so they are not counted twice.

In addition to meeting all FIP criteria, the child must be under age 13 (under age 19 if a child has special needs).

Iowa may use state expenditures for child care assistance that are counted as MOE for both TANF and the CCDF, and thus subject to the cap at 409(a)(7)(B)(iv) of Title IV-A of the Social Security Act. Iowa may use additional state child care expenditures that are not claimed as match or MOE for the CCDF or any other federal program, as MOE for TANF.

- **State Child Care Assistance for Working Non-FIP Families:**

This program provides state funding for the child care needs of working non-FIP families, excluding protective child care. State expenditures that can be claimed as MOE are subject to the limits under 45 CFR 263.5(b).

Family eligibility criteria:

- Working or a combination of work and school, for a minimum of 28 hours/week;
- Gross monthly income less than or equal to 145% of the federal poverty level based on family size for initial eligibility and less than or equal to 85% of the state median income level based on family size for continued eligibility; and

- Must cooperate with the DHS' quality control review unit and with investigations conducted by the Iowa Department of Inspections and Appeals.

Child eligibility criteria:

- Under age 13 (under age 19 if child has special needs);
- Citizen or a qualified alien; and
- Live in Iowa.

- **TANF Transfer to Child Care Development Fund (CCDF):**
Iowa transfers TANF funds to the Child Care Development Fund (CCDF) as authorized by section 404(d)(1)(B) of the Social Security Act.
- **TANF Child Care Assistance for Working FIP Families:**
This program provides direct TANF funding for the child care needs of working FIP families, excluding two-parent FIP families.

In addition to meeting all FIP criteria, the child must be under age 13 (under age 19 if a child has special needs).

Note that in all instances where child care assistance is provided for **Two-Parent Families Receiving FIP**, state only funds under the **State Child Care Assistance Previously Authorized** program are used, regardless of employment status.

- **TANF Child Care Assistance for Working Non-FIP Families:**
This program provides direct TANF funding for the child care needs of working non-FIP families, excluding protective child care.

Family eligibility criteria:

- Working or a combination of work and school, for a minimum of 28 hours/week;
- Gross monthly income less than or equal to 145 percent of the federal poverty level based on family size for initial eligibility and less than or equal to 85% of the state median income level based on family size for continued eligibility; and
- Must cooperate with the DHS's quality control review unit and with investigations conducted by the Department of Inspections and Appeals.

Child eligibility criteria:

- Under age 13 (under age 19 if child has special needs);
- Citizen or a qualified alien; and
- Live in Iowa.

Previously Authorized Services:

The state may use TANF funds for a number of services previously authorized under its IV-A or IV-F State Plan in effect as of September 30, 1995.

Commonly and collectively referred to as IV-A Emergency Assistance, these services are provided to children who are: victims of abuse or at risk of abuse or neglect; at risk of out-of-home placement; or are in need of care. Services include: family assistance fund; social casework; family preservation; family foster care; adolescent monitoring and tracking; and shelter care (over 48 hours).

Family assistance fund services which reduced the risk of placement of the child outside the home through the purchase of emergency food, shelter, clothing or other time-limited emergency assistance that was directly related to the goal of reducing the risk of placement, was terminated in 2007.

Families must meet general child welfare eligibility criteria regardless of the specific service(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 the prior IV-A or IV-F State Plan: 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 Assistance, 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.

The state no longer categorizes or reports TANF expenditures on the basis of being previously authorized. With the exception of adolescent monitoring and tracking, all of the previously authorized programs above have been determined to meet one or more of the four statutory purposes under 401(a) of Title IV-A of the Social Security Act and incorporated into the ***Pregnancy Prevention/Services to At-Risk Children*** section of this Plan.

As a juvenile justice service, adolescent monitoring and tracking has been determined by the federal Office of Family Assistance to not meet any of the four statutory purposes of TANF (see TANF-ACF-PI-2015-02). The state could use TANF funds for this program on the basis that it was previously authorized. However, effective July 1, 2016, the state has opted to use 100 percent state funds for this program. This action was taken to: (1) avoid the administrative burden associated with distinguishing those adolescents and services meeting

the prior state plan requirements from those who do not – necessary as the program has evolved since the prior State Plan was in effect; and (2) prevent any unintended misuse of TANF funds if this distinction is not made correctly.

State funds expended for adolescent monitoring and tracking are not claimed for MOE nor are state expenditures for any other juvenile justice services.

Pregnancy Prevention/Services to At-Risk Children:

- **Community Adolescent Pregnancy Prevention Program:**
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 18 years of age and attending school to pursue a high school diploma or equivalent. There are no income or resource requirements. Services to an adolescent under 18 may continue beyond the adolescent's eighteenth birthday under certain circumstances.

The following programs provide services to at-risk children. These services are intended to meet the 3rd statutory objective of TANF to prevent and reduce the incidence of out-of-wedlock pregnancies. National and state studies indicate that victims of child abuse, sexual abuse and neglect have a higher incidence of out-of-wedlock pregnancies than the general population. Services described in the following programs are critical to ensure the safety of the child and prevent reoccurrence of abuse.

- **Child Welfare Services:**
The state may use TANF funds for a number of Child Welfare Services including or similar to those previously authorized under the prior IV-A State Plan. The individual and collective purposes of Iowa's Child Welfare Services are to reduce and avert child abuse.

These services include: social casework; protective day care; family centered/family preservation which includes safety plan services; family safety, risk, and permanency services with family team meeting facilitation; and drug testing.

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. There are no any other eligibility criteria specific to this program.

- **Child Abuse Prevention Program:**

TANF funds are used for community-based child abuse prevention services that provide family support, home visitation, and respite care.

Programs are expected to provide targeted services to families with specific risk factors for maltreatment. Local child abuse prevention councils compete for funds to develop and operate programs in one or more of five major areas: (1) community development (i.e. public awareness, engagement); (2) home visitation (requires use of a federally recognized evidence-based model); (3) parent development (group family support or education); (4) respite care; and (5) sexual abuse prevention. Crisis and/or respite care provided using TANF funds are limited to non-recurrent, short-term services.

Child abuse prevention programs are open to all members of the community without regard to family structure, education, income or resources; however, non-TANF funds are used for individuals and families not eligible to receive benefits funded by TANF; e.g., ineligible aliens. Programs are expected to provide targeted services to families with specific risk factors for maltreatment.

Certain aspects of this program may also meet the 4th statutory objective of TANF, to encourage the formation and maintenance of two-parent families.

- **Child Protective Assessments:**

TANF funds are used to assess reported incidents of child abuse and neglect when the family is determined to be ineligible for funding under Title IV-E of the Social Security Act. Assessments may include drug testing.

Applications for additional services available from the DHS and referrals to other community support services are made based on the finding(s) and risk level of each assessment. Assessments are provided without regard to family income or resources.

- **Community Care Services:**

Community Care is a voluntary service that provides child and family focused services and supports to families referred from the Department of Human Services (DHS). Community Care was initially developed and implemented as part of Iowa's child welfare redesign in March 2005.

The goals of Community Care are to: reduce concerns for families that create stress and negatively impact relationships between family members; assist families with improving relationships within the family and build connections in their community; provide contacts and services that

meet the family's needs; meet the cultural needs of families through better matching of community service providers; and develop support systems for families to increase the resources available in order to reduce stressors the family may be experiencing.

These services and supports are geared to keeping the children in the family safe from abuse and neglect; keeping the family intact; preventing the need for further and future intervention by the DHS (including removal of the child from the home); and building ongoing linkages to community-based resources that improve the safety, health, stability, and well-being of those served.

Community Care works directly with families who are referred by DHS to reduce safety and risk concerns. Community Care is targeted to children and families after completion of a Child Protective Services (CPS) Child Abuse Assessment Summary or a CPS Family Assessment Summary. The population served under this service contract changed with implementation of Differential Response on January 1, 2014. Community Care eligibility criteria includes:

- Community Care has been identified as being needed and the family has agreed to participate voluntarily in services related to a CPS Child Abuse Assessment Summary that is Not Confirmed, but the child is believed to be at moderate to high risk of future abuse or neglect; or
- Community Care has been identified as being needed and the family has agreed to participate voluntarily in services related to a CPS Child Abuse Assessment Summary that is Confirmed, Not Placed, and the child is believed to be at moderate risk of future abuse or neglect; or
- Community Care has been identified as being needed and the family has agreed to participate voluntarily in services related to a CPS Family Assessment Summary and the child is believed to be at moderate to high risk.

Court orders cannot be used as a mechanism for families to receive Community Care. If a child has been adjudicated as a Child In Need Of Assistance (CINA) or a CINA petition was filed or pending, or a child has been adjudicated delinquent, the family is excluded from Community Care. A family will also be excluded from a referral to Community Care if the family has any children in the household with an open Department Child Welfare Service case, or abuse outside of the home has occurred.

Presented below are Community Care service intervention activities and supports. This is not an exhaustive list but is to describe the range of core activities that may be necessary to achieve desired outcomes in the types of cases referred for these services:

- Safety and Risk Management Planning
 - Family Skill Development
 - Family Focused Service Planning
 - Empowerment and Advocacy Service
 - Parenting Skills and Education
 - Substance Abuse Education
 - Domestic Violence Education
 - Consumer Education
 - Mental Health Education
 - Flex Fund Assistance
 - Budgeting
 - Household Management Assistance and Instruction
 - Family Team Decision-Making (FTDM) Meetings
 - Communication Skills Parent/Child Relationship building
 - Information and Referral (I & R) to a wide range of community resources and services
- **Decategorization:**
TANF funds support Decategorization services to troubled or at risk children and their families.

Decategorization is intended to help communities achieve a system in which services are driven by family strengths and needs to replace systems based upon a multitude of categorical programs and funding sources. Decategorization is designed to redirect families to services which are more preventive, family centered, and neighborhood or community-based, in order to reduce use of restrictive approaches to stabilizing family functioning that otherwise rely on institutional, out of home, and out of community placements.

In Decategorization, state and local officials work together to prevent children and youth from being placed in foster care and to develop services effective at promoting stability and safety for children and families in their respective communities. Through working in partnership, state and local officials develop strategic approaches to strengthening communities and developing deeper service capacity at the local level. There are several categories of services supported through Decategorization, including:

- Coordinator and contract supports;
- Parenting/family support programs;
- Community-based supports; and
- School-based programs.

Decategorization promotes community planning, collaboration, and governance of service systems that more accurately reflect the needs of children and families within the communities served.

Certain aspects of this program may also meet the 4th statutory purpose of TANF to encourage the formation and maintenance of two-parent families.

Programs to Encourage Two-Parent Families:

The following program(s) provide services intended to meet the 4th statutory purpose of TANF, to encourage the formation and maintenance of two-parent families.

- **Promoting the Benefits of a Healthy Marriage:**

This program uses a paper brochure to provide information on the benefits of a healthy marriage and is available only to households applying for and/or receiving benefits under the Iowa Food Assistance Program.

Households must have gross income at or below 160 percent of the federal poverty level with no asset or resource limitations. Households must otherwise meet Food Assistance eligibility factors. Households who are eligible for this program become categorically eligible to receive Iowa Food Assistance Program benefits. There are no other services available beyond the informational brochure.

Other TANF or State Only Funded Programs:

- **Family Development and Self-Sufficiency (FaDSS) Program for Non-FIP Families:**

This TANF and state MOE funded program provides the same type of intensive in-home family development services as described under ***Family Investment Program (FIP) Related Programs***, to families not eligible for FaDSS services under that section as they are not currently receiving FIP nor have they received FIP in the past seven months. This includes: families who have never applied for or received FIP; former FIP families beyond the seven month extension period for receiving FaDSS; and families ineligible for FIP for various reasons ranging from being over income, to meeting the 60-month time limit. Families must meet the eligibility criteria described below.

The program will work with families until the family has achieved a measure of self-sufficiency and family stability equivalent to meeting a household survival budget, as described under the “eligibility criteria” income limits.

The Iowa Department of Human Rights, Division of Community Action Agencies, (DCAA) administers this program. **The FaDSS for Non-FIP Families Program** began July 1, 2019, as a pilot project, through contracted agencies in five targeted areas in the state.

Eligibility criteria:

- The following definitions and criteria described under **Iowa's Family Investment Program (FIP)** apply:
 - Citizen or qualified alien.
 - Social security number or proof of application.
 - Iowa residency.
 - Family composition.
 - Dependent child in the household.
- Gross income at or below 175% of the federal poverty level based on family size at enrollment into the program and less than or equal to 65% of the state median income level based on family size for continued eligibility as determined by the Low-Income Heating Energy Assistance Program (LIHEAP) criteria.
- Continued eligibility will be assessed on an annual basis as determined by the LIHEAP criteria.
- Households can meet income eligibility through categorical eligibility that is determined by the LIHEAP, Head Start and Early Head Start programs, Women, Infants, and Children (WIC) programs, Supplemental Nutrition Assistance Program (SNAP) or other programs determined by the DCAA.
- Meet one or more of the at-risk criteria established in 427—15.4 (216A) Iowa Administrative Rules.

Certain aspects of this program meet all four purposes of TANF:

1. Provide assistance to needy families so that children can be cared for in their own homes;
 2. Reduce the dependency of needy parents by promoting job preparation, work and marriage;
 3. Prevent and reduce the incidence of out-of-wedlock pregnancies; and
 4. Encourage the formation and maintenance of two-parent families.
- **Refundable Iowa Earned Income Tax Credit (EITC):**
This Separate State Program provides a refundable Iowa EITC to needy families effective with tax year 2007.

Eligibility for the state EITC is based on eligibility for the federal EITC. Consequently, eligibility criteria, including income limits, are those used for the federal EITC for families in any given year.

Iowa's EITC is paid for with 100 percent state dollars. Previous to tax year 2007, Iowa allowed EITC as a tax credit, but none of the credit was refundable. State funds used to provide state EITC refunds to families became a new MOE investment effective FFY 2008. For tax years 2007-2013, the state EITC was seven percent of the federal EITC. Iowa's EITC increased to 14 percent of the federal EITC effective for tax year 2014 and to 15 percent for tax year 2015. This program meets TANF purposes one and two: 1) provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; and 2) ending the dependence of needy parents on government benefits by promoting job preparation, work and marriage.

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

Only the amount of refundable state EITC actually paid to the tax payer or offset and paid to another family; i.e., to meet a child support obligation, is considered to be MOE. Amounts offset for other purposes are not considered to be MOE expenditures.

- **Transfers to the Social Services Block Grant (Title XX):**
TANF funds are transferred to the Social Services Block Grant (SSBG) within the parameters of federal law at Title IV-A, Section 404(d) of the Social Security Act.

(ii) Require a parent or caretaker receiving assistance under the program to engage in work (as defined 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, consistent with section 407(e)(2).

For purposes of Section 402(a)(1)(A)(ii), "engaged in work," as defined by Iowa, means participation in Family Investment Agreement (FIA) activities. Specific work activities that are counted towards the federal work participation rates are described in Iowa's Work Verification Plan effective January 2014.

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 services they need to help them become economically self-sufficient and avoid long-term dependence on public assistance. A key element is the establishment of the FIA. The FIA is an individualized agreement between the DHS and the recipient. The agreement addresses: a particular family's needs; the services to be provided by the DHS; 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 FIA renegotiated and amended.

Unless determined to be exempt, the following people must participate in PROMISE JOBS and develop an FIA:

1. All adults on the FIP grant, including those in the Two Parents Receiving FIP program;
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 qualified alien as defined at 8 United States Code (USC) Section 1641.
5. All persons described in items 1-4 and receiving cash benefits under the FIP for Battered Aliens Program.

As of July 2002, exemptions are granted only to people listed above who are receiving Supplemental Security Income due to disability or blindness.

In order to more effectively assist families to become economically self-sufficient in the shortest amount of time, all persons that apply for FIP benefits on or after November 1, 2004, unless determined to be exempt, must cooperate with PROMISE JOBS and establish and sign an FIA before eligibility for FIP program benefits may be determined.

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 qualified alien and to fund the costs of PROMISE JOBS participation for FIP for Battered Aliens recipients. Aliens who are not qualified aliens as defined at 8 USC 1641 are not eligible for PROMISE JOBS.

The FIA requires each FIA-responsible 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 equivalent; adult basic education; English as a second language; post-secondary education not leading to a degree beyond a bachelor's degree; 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 provide 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, receives 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 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 FIA. 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.

PROMISE JOBS workers guide and support FIP participants so they may become self-reliant through individual growth, job retention, and economic stability. Where available locally at no cost, mentors help these 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 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 FIA. 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 FIA.

In addition, PROMISE JOBS participants have access to services offered by provider agencies outside of PROMISE JOBS, such as vocational rehabilitation and housing programs, and can include these in their FIAs. Barriers to participation in the FIA cannot be used to excuse or exempt an FIA-responsible person from participation but must be resolved so that participation can result.

The DHS contracts with Iowa Workforce Development to provide the PROMISE JOBS services listed above. The DHS' Bureau of Refugee Services provides PROMISE JOBS services, to the extent possible with resources available, to people who entered the United States with a refugee status, until they have obtained U.S. citizenship. 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 Deficit Reduction Act of 2005 and described in Iowa's Work Verification Plan) in their Family Investment Agreements (FIA). 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).

FIP applicants required to participate in PROMISE JOBS who do not sign an FIA are denied eligibility for program benefits.

FIP participants, required to participate in PROMISE JOBS and who fail to sign an FIA, or who sign an FIA but fail to carry out the terms of the agreement, enter a limited benefit plan (LBP). If the FIA-responsible person is a parent, the limited benefit plan applies to the entire family. However, if someone other than the parent is the FIA-responsible person, then the LBP applies to only that individual.

The DHS last redesigned the limited benefit plan effective June 1999, to implement state law changes. A first-time limited benefit plan results in ineligibility indefinitely until the FIA-responsible person signs an FIA. A second or subsequent LBP will result in a minimum of six months of ineligibility. The ineligibility will continue after the six-month period is over until the FIA-responsible person reapplies for FIP, signs an FIA and completes significant action with the PROMISE JOBS program.

An LBP will not be imposed if the individual is a single custodial parent caring for a child who has not attained thirteen years of age and the individual has demonstrated an inability (as determined by the State) to obtain needed child care due to one or more of the following reasons:

- (A) Appropriate child care within a reasonable distance from the home or work site is unavailable;
- (B) Informal child care by a relative or under other arrangements is unavailable or unsuitable; or
- (C) Appropriate and affordable formal child care arrangements are unavailable.

Iowa has extended the criteria found at 45 CFR 261.56 to include children 6-13 years of age, as quality child care is necessary for all children.

An LBP 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, the DHS, as 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 (in Iowa, up to age 13) demonstrates an inability to obtain needed child care and is exempt from an LBP 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 to the FIP family.

Unsuitability of Informal Care means a child care center that 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 a reasonable distance from the participant's home and work related activity exempts 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 local PROMISE JOBS or DHS 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 lifetime benefit limit.

The DHS informs parents of the child care exception to work requirements 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.

(iv) Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government.

All DHS records are open to the public except those containing confidential information. Confidential information cannot be disclosed except to administer programs of the DHS 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; and
- Medical or psychiatric data.

Information may be released to:

- Public officials to administer program requirements;
- Law enforcement officials under certain limited conditions; and
- A multidisciplinary team approved by the DHS if the sole focus is identifying services for children who are victims of, and children at risk of becoming victims of, human trafficking

With respect to Family Development and Self-Sufficiency (FaDSS) programs, all IDHR records are open to the public except those containing confidential information. Confidential information cannot be disclosed except to administer programs of the IDHR 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; and
- Medical or psychiatric data.

Information may be released to:

- Public officials to administer program requirements; and
- Law enforcement officials under certain limited conditions.

(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 (as defined in section 403(a)(2)(C)(iii)).

TANF funded Community Adolescent Pregnancy Prevention (CAPP) grant programs operate in more than 50 percent of the state. TANF funding has increased the availability of these services. Grants are available to communities who have a proven track record in achieving results or who will utilize a proven method of service and must include abstinence education. Baseline data are used to establish additional numerical goals. Also, PROMISE JOBS and Family Development and Self-Sufficiency (FaDSS) programs provide information about family planning counseling services. See Attachment H for more details on goals.

(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.

Statutory rape is commonly defined as sexual contact with an individual who is below the legal age of consent. Iowa's age of consent is 16 years old. Individuals aged 15 or younger in Iowa are not legally able to consent to sexual activity, and such activity may result in prosecution for statutory rape. Iowa statutory rape law is violated when a person has consensual sexual intercourse with an individual under age 16. A close in age exemption allows teens aged 14 and 15 to consent to partners less than 4 years older. Regardless of age, it is also illegal for a school employee to engage in sexual intercourse with a current student or even a student who attended school within 30 days of such a violation.

Iowa has seven statutory sexual abuse charges on the books which are used to prosecute age of consent and child abuse related crimes within the state. One or more of these charges may be used to prosecute

violations of the Iowa Age of Consent, as statutory rape. The severity of the criminal charge (felony, misdemeanor, etc.) depends on the specifics of the acts committed and the relative ages of the perpetrator and victim. In Iowa, child abuse, specifically sexual abuse, provides the legal basis for defining acts as constituting statutory rape. Consequently, Iowa's efforts to address statutory rape focus on child abuse.

The Department of Human Services (DHS) provides Mandatory Reporter training for all mandatory reporters in Iowa and maintains educational program resources on the DHS website for those required to report child abuse as well as the general public, to encourage the fullest possible degree of reporting 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 using mandatory reporter training curricula developed and provided by the DHS.. 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 DHS 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 the child or a person who is fourteen years of age or older and who resides in a home with the child” as defined by Iowa Code section 232.68(2)(a)(3).

The DHS has established policies and procedures regarding identifying and assessing all reports involving known or suspected child sex trafficking victims (as defined in section 103(10) of the Trafficking Victims Protection Act of 2000 (TVPA) (22 U.S.C. 7102)).

The DHS has provisions and procedures for training staff and contractors about identifying, assessing and providing comprehensive services to children who are sex trafficking victims, including efforts to coordinate with state law enforcement, juvenile justice, and social service agencies such as runaway and homeless youth shelters. The DHS considers any child who is identified by a state as a victim of sex trafficking or severe forms of trafficking as a victim of “child abuse and neglect” and “sexual abuse.”

In order to reduce relationship violence and teen pregnancy, the DHS funds Domestic Sex Trafficking courses and has commissioned providers to develop mini-conferences that focus on the emotional, physical and financial transitioning needs of teens in care.

Community providers access a common meeting space and provide opportunities for local service providers and youth experts to share their skills and connect programs. There are shared opportunities for youth to

attend classes on sexual health, relationships, parenting, cooking, budgeting, wellness, self-care, trauma, etc. The DHS supports these activities because citizens and community partners are engaging with youth to discuss supports and services to benefit youth.

In addition, Iowa's adolescent pregnancy prevention and parenting programs at the state and community levels include adolescent males. The DHS works to identify opportunities for appropriate program expansion. Although participation in the educational aspects of the program is currently limited to adolescents, one of the objectives of the program is to provide for public awareness and education, which reaches beyond the scope of adolescence. In addition, the program works to build community coalitions of local health and human service providers to provide for a comprehensive approach to preventing teen pregnancy. Also, PROMISE JOBS and the Family Development and Self-Sufficiency (FaDSS) programs provide information about family planning counseling services.

- (vii) Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance.**

The State has implemented the following policies and procedures to comply with this requirement. These policies and procedures are based on Iowa's reasonable interpretation of P.L. 112-96 and subsequent implementing federal regulations, and are supported by state statute and administrative rules.

Effective February 1, 2014, FIP participants are prohibited from using their electronic access card (EAC) to access benefits at any of the following locations as defined by federal statute or regulation, and as further defined by state statute or administrative rule:

- (1) A liquor store;
- (2) A casino, gambling casino or gaming establishment; or
- (3) A retail establishment that provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.

When the DHS receives a detailed complaint or suspects that a participant has used their EAC at a prohibited location, the case is referred to the Department of Inspections and Appeals (DIA) for further investigation. If

the referral is founded, the action will be considered fraudulent. Penalties for the participant household include:

- Requirement to repay any amounts accessed at a prohibited location, along with any associated fees that may apply;
- Three-months of FIP ineligibility for the first finding of misuse; or
- Six-months of FIP ineligibility for each subsequent finding of misuse.

When parents from a two-parent family separate during an ineligibility period:

- If the participant who misused the EAC is identified, the ineligibility period will follow only that participant.
- If the participant who misused the EAC at a prohibited location is not identified, the ineligibility period will follow the participant identified as the head of the household when the violation occurred.

As of January 1, 2014, information regarding the Middle Class Tax Relief and Job Creation Act of 2012 requirement that limits where FIP participants can use their EAC and the penalties for using the card at a prohibited location was added to essential FIP forms. These forms include:

- FIP Notices of Decision (NOD) for benefit approval, change and reinstatement;
- FIP Application;
- Review/Recertification Eligibility Document (RRED), form 470-2881, 470-2881(S);
- Comm. 108-Family Investment Program Brochure;
- Comm. 377 FIP Electronic Access Card; and
- Comm. 233 Right and Responsibilities.

State statute gives the DHS the authority to take additional measures if required by federal law. Such measures could require changes in administrative rules, employee manuals, systems, forms and other informational materials issued to FIP applicants and recipients, and the contract the DHS has with the vendor managing EAC accounts.

To ensure that these policies and procedures do not prevent recipients from having adequate access to their cash assistance, the state has, to the extent not expressly precluded by federal law or regulation, or by the federal Office of Family Assistance (OFA), further defined the places described in section 408(a)(12) so as to minimize the number of locations where electronic benefit transactions are prohibited, and to maximize the number of locations where the prohibition does not apply.

Given the total number of financial institutions, automated teller machines (ATMs) and point-of-sale (POS) devices in the state that accept the state's EAC, and that the state's EAC allows for receiving cash back at point-of-sale devices in conjunction with making a purchase when such service is available, ATMs and POS devices at prohibited locations (as defined by the state), represent a very small percent of the total. The sheer volume of alternative locations where electronic benefit transactions are not prohibited ensures that FIP families continue to have adequate access to their benefits.

See Attachment J for additional details describing policies and practices to prevent electronic benefit access at prohibited locations while ensuring recipients have adequate access to their benefits.

(viii)[5] Ensure that recipients of assistance provided under the State program funded under this part have access to using or withdrawing assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available.

The Iowa electronic access card (EAC) is provided at no cost to FIP participants. There are no monthly fees charged for managing the account. Information on applicable fees is provided with each EAC and on the contractor's website at www.EPPICard.com. Information on fees is also provided on the DHS website at <http://dhs.iowa.gov/sites/default/files/Comm377.pdf>.

Access is provided as follows:

- Each calendar month:
 - Three free cash withdrawals from participating bank ATMs + \$1.35 fee after the free withdrawals are used and for withdrawals at non-participating bank ATMs.
 - Three free balance inquiries from participating bank ATMs + \$.50 per inquiry after the free queries are used.
 - Six free calls to the Interactive Voice Response (IVR) system + \$.40 per call after the free calls are used.
- No limit on free cash withdrawals from VISA bank tellers through December 31, 2019. Starting January 1, 2020, no limit on free cash withdrawals from Mastercard bank tellers
- No fee for purchases.
- No fee for cash back with purchase.
- No fee for online transactions or accessing account information.

- No fee for calls to transfer to a customer service representative to report a lost, stolen, or damaged card; request a card replacement; report transaction difficulties; or request account error resolution.
- One free card replacement each calendar year + \$5.00 for each subsequent replacement.
- ATM denials cost \$.50.

(B) SPECIAL PROVISIONS

- (i) The document shall indicate whether the State intends to treat families moving into the State 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.**

Iowa provides assistance to recipients of the TANF Family Investment Program and the Family Investment Program for Battered Aliens.

Eligible non-citizens of the United States have eligibility and benefits determined in the same manner as citizens. Qualified aliens, who entered the U.S. before August 22, 1996, are eligible for assistance. Qualified aliens who entered the U.S. on or after August 22, 1996, are not eligible for assistance for five years following the date of entry, except for:

- Those qualified aliens exempted from the five-year limitation by Title IV, Section 403, of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 who may receive regular Family Investment Program (FIP) benefits and
- Those aliens who qualify for the FIP for Battered Aliens Segregated State Program.

For those ineligible for FIP cash assistance or FIP for Battered Aliens 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.**

The DHS 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.

The DHS 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.

Applicants and recipients have the right to appeal any decision and any adverse action taken by the DHS 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; and
- Recovery of an overpayment.

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

- (iv) Not later than 1 year after the date of enactment of this section, 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 has opted out of this provision. See Attachment A.1 for details.

- (v) The document shall indicate whether the State intends to assist individuals to train for, seek, and maintain employment-**

- (I) providing direct care in a long-term care facility (as such terms are defined under section 2011); or**
- (II) in other occupations related to elder care determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.**

Iowa does not have any special provisions in place with respect to assisting individuals to train for, seek, and maintain employment in the types of occupations described above. Individuals assessed as having an aptitude or interest in these types of occupations and able to pass the required background checks, are encouraged to seek training to prepare them for work in these fields. Individuals participating in the requisite training for these occupations are eligible to receive the same type of assistance available to individuals in other types of training described in the earlier PROMISE JOBS Expense Allowances section of this Plan.

(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.

(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 TANF State Plan Certifications, Iowa will operate a foster care and adoption assistance program under a State Plan approved under Part E and take actions as are necessary to ensure that children receiving foster care or adoption assistance are eligible for medical assistance under Title XIX.

(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 (1) for the fiscal year, which shall include assurances 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 TANF State Plan Certifications, the Iowa Department of Human Services (DHS) is the state agency with the primary responsibility for administering the program referred to in paragraph (1). Effective July 2007, the Iowa Department of Human Rights (IDHR) became responsible for administering the Family Development and Self-Sufficiency grant (FaDSS) program.

Iowa implemented TANF effective January 1, 1997. In October 1996, Iowa sought 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 that shows the work group structure.) Although the Advisory Group and the 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, 2019, plan and design of Iowa's welfare services. The TANF State Plan will be posted to the DHS website at www.dhs.iowa.gov under Cash Assistance (<http://dhs.iowa.gov/cash-assistance>).

(5) CERTIFICATION THAT THE STATE WILL PROVIDE INDIANS WITH EQUITABLE ACCESS TO ASSISTANCE.

A certification by 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 TANF 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.

(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 TANF 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.

(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:

- (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 incorporates the following domestic violence provisions into its Family Investment Program (FIP):

- FIP is available to immigrants who have been battered or subjected to extreme cruelty and who are eligible as qualified aliens under the provisions of 8 U.S.C. 1641(c) – see **Family Investment Program for Battered Aliens**.
- In accordance with section 454(29) of the Social Security Act, the DHS may determine that FIP applicants and recipients have good cause due to domestic violence issues, for not cooperating with the state IV-D agency.
- Although 45 CFR 264.1- **What restrictions apply to the length of time Federal TANF assistance may be provided?** identifies criteria meeting the definition of domestic abuse separate from hardship criteria as defined by the state, as a basis for granting an exception to the federal time limit for receiving TANF assistance, Iowa has incorporated domestic violence into its hardship criteria. The DHS then may extend FIP beyond the 60-month federal limit by determining a hardship exists due to domestic violence.
- Individuals referred to the PROMISE JOBS program complete a self-assessment form which screens for domestic violence by asking if there have been threats or acts of violence toward family members.

The PROMISE JOBS Employees' Manual includes protocols for working with families identified as having domestic violence issues, including but not limited to providing brochures and packets of information about local domestic violence services available, and making referrals to these services as appropriate. Victims of domestic violence can be granted a waiver for participation in certain work-related activities 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.

Waivers from work participation requirements comply with 45 CFR 260.55, including the family's agreement to a safety plan to address or prevent family or domestic violence which is reviewed at least every six months, and are the only domestic violence good cause waivers that meet the requirements for federal recognition defined at 45 CFR 260.51. See certification in Attachment B.

Staff involved with the PROMISE JOBS program receive training on domestic violence, the tool used to screen for domestic violence, and how to address domestic violence in the Family Investment Agreement (FIA) for the client.

- It has always been possible for FIP participants who are victims of domestic violence to receive counseling and supportive services.
- 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.

(c) PUBLIC AVAILABILITY OF STATE PLAN SUMMARY. The State shall make available to the public a summary of any plan or plan amendment section.

Iowa will make available to the public a summary of any plan submitted under section 402(a). (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 TANF 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 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.

The Iowa Department of Human Services (DHS) has lead responsibility for administering this provision. The public is notified about procedures

concerning displacement complaints through the publication of administrative rules in the Iowa Administrative Code (IAC). Procedures for filing and handling displacement complaints are found at IAC 441—93.17 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 TANF 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 TANF State Plan Certifications, the families for which Iowa is claiming maintenance of effort expenditures meet the State's criteria for “eligible families” as defined in this TANF State Plan.