

## Career Assistance Program (CAP) SE Region Local Policy

### CAP Policy/Forms

- If any subcontractor wishes to make a local CAP Policy or add any forms other than the ones provided through the WIB, these **MUST** be approved by President/COO.

### Employment Verification

- Written or verbal verification from FSD worker
- Written or verbal verification from employer
- Check stubs
- Employment verification Toolbox case note must contain the following information; place of employment, supervisor/manager's name, employer's telephone number, hourly wage, how often paid, date of first payroll check, and first day of work. **Do not enter the service if you have not verified that recipient actually attended the first day of employment.**

### Transportation Related Expenses (TRE)

- All services with the exception of Unsubsidized Employment (see incentive card policy) are eligible to be paid TRE as long as the client is meeting both core and required participation hours and demonstrates a need as long as the TANF case is active.
- TRE is allowed to be paid retroactively for the previous two week period. The WIB will allow no more than two weeks of back pay for TRE.
- The WIB will no longer allow post employment TRE to be paid for up to 4 weeks if the client's case closes due to increase in income or if the client requests that FSD close their case when the monthly cash grant has decreased due to employment in order to save months toward their lifetime limit.
- TRE will not be allowed for job search logs that are turned in with missing information (i.e. missing address, contact information, and phone number) unless they are completed properly before the cutoff date. Case Manager's **MUST** inform the client that they will not receive TRE unless the job search log has all pertinent information. Per Susan Petersen, DWD Central Office, "It is the case manager's responsibility to work with the customer to make sure the log is completed and provides further guidance. The log can be given back to the customer and they can be directed to a resource (i.e. computer, telephone book, etc.) to complete this information".
- TRE can be paid while participant is trying to work off sanction.

- Over payments must be reimbursed to the WIB and documented in toolbox. If participant is still receiving TRE the overpayment can be deducted from what is owed. Overpayments must be reconciled on or before the end of the following quarter. In the event that overpayments occur during the fourth quarter of current program year, this must be reconciled by June 30.

According to DWD Issuance 10-2008, Attachment 1, Section 1: **“TRE payments are allowable only when a transportation cost is incurred, client is fully participating and a need is demonstrated. All TRE payments will be made upon the availability of funding.”**

### **Employment Incentive Policy**

\*\*\*Incentive Policy retroactive to December 1, 2008.

- Clients must meet the following criteria in order to be eligible to receive incentive bonuses:
  - Must meet both core activity requirements and their required participation hours in unsubsidized paid employment.
  - Must retain employment for attendance time sheet period and remain employed upon submitting attendance sheet. (I.e. Incentives not to be given if client worked for 30 day timesheet period, but was fired day before bringing sheet in.)
  - Case must be active upon end of attendance sheet period.
- If a client meets all requirements, incentive bonus' will be given in the following manner:
  - \$100.00 upon verification of entered employment
  - \$150.00 upon verification of continued employment after 30 days
  - \$150.00 upon verification of continued employment after 60 days
- Incentive Bonuses to be given for the first employment per CAP enrollment, unless:
  - Client loses first employment through no fault of their own
  - Client gains other employment that betters their situation (example; higher wage, better hours, less travel, etc. This will be at the case manager's discretion). No break in employment is acceptable.
- Incentive Bonus' will only be documented through Toolbox case notes. For CPR purposes case note should include: Type of gift card, gift card number, amount, and reason (i.e. 30 day employment retention). Case note and expense should not be documented until the participant has physically been given the incentive card. There will be no exceptions!

\*\*\*Incentive Bonuses will be made based upon the availability of funding.

### **Work Related Expenses (WRE)**

- Service Providers are no longer required to request WIB approval for WRE purchases. Approval/denial to be granted by local supervisor.
- Clients who are meeting both their core activity requirements **and** their required participation hours are eligible to receive a maximum amount of \$350.00 WRE in a 12 month period based on individual need and available funding when the Temporary Assistance Case is **open**.
- Client must provide Case Manager with two written estimates for cost of car repair.
- Must have proof of ownership of vehicle prior to approving car repair. **If the car does not belong to client, applicant statement is required. Statement needs to be signed by owner, client and witnessed by case manager.**
- WRE can be used while participant is trying to work off sanction.
- Verification from FSD must be provided for Dental/Medicaid expenses not covered by Medicaid or private health insurance.
- Driver's license fees, SATOP classes, and up to three months of liability insurance are allowable expenses.
- CAP funds may be used to pay rent or utilities if prior approval is given by the WIB.
- Post employment WRE can be paid for **up to 4 weeks only** if the client's case closes due to increase in income or if the client requests that FSD close their case when the monthly cash grant has decreased due to employment in order to save months toward their lifetime limit. Reason of closure must be documented in case notes. *Service provider can narrow or eliminate time frame if deemed necessary.*
- Personal property taxes, automobile licensing fees, legal costs, fines and penalties are non-allowable expenses.
- Case notes **MUST** be entered into toolbox, including the reason for WRE being used, total cost, check number and to whom payment goes. If information is not entered into toolbox (real time data entry) case notes, the expenditure will be disallowed. **There will be no exceptions!**
- Local files must be maintained with all back-up documentation supporting expenditures of WRE funds. If back-up documentation is not located in recipient's file, the expenditure will be a disallowed cost.

According to the CAP Policy & Procedure Manual (page 2 WRE policies): **“Ensure that the individual has exhausted all other resources before using WRE funds for any purpose. Determine the individual's ability to pay a portion of the expense.”**

## **Tuition**

- Prior to paying tuition, recipients must complete the WIN assessment and score at least the minimum level for their occupational choice.
- Tuition is available for up to 12 months under CAP Occupational/Vocational Education Training (CAP OVET).
- Client must apply for Pell Grant prior to approving tuition.
- Up to 50% of Pell Grant can be used for tuition. If service provider funding does not allow for 50% of balance to be used, up to 100% of Pell Grant must be used toward tuition cost.
- Training must be DESE approved as well as an in-demand occupation (MERIC) for the SE Region. If not, a written request must be submitted to the WIB to ask for a waiver.
- \$3,500.00 is the maximum to be used for non-Medical training field.
- \$6,000.00 is the maximum to be used for Medical training field.

## **Post Enrollment Non-Compliant Recipients**

- Clients who are non-compliant should be referred to Sherri Dalton (St. Francois, Madison, Iron, Ste. Genevieve, Perry, Bollinger and Cape) and Nancy Watts (Dunklin, Pemiscot, New Madrid, Mississippi, Scott and Stoddard) in order to start the conciliation/sanctioning process.
- The pilot project Conciliation/Sanctioning Procedure should be followed for all non-compliant clients.
- Monthly toolbox generated letters
- Monthly free-form letters are no longer required but may be done at the Case Manager's discretion or at the request of a supervisor or CAP Coordinator.
- Contact Family Support Division for possible updated information
- Document in the toolbox case history every attempt that is made to reengage the referred/enrolled recipient.

## **Immediate Engagement\***

- The following documents are required on all CAP applicants:
  - Orientation
  - Assessment
  - Employment Plan
  - Declaration Statement/Complaint & Grievance

- Release of information
- Domestic Violence Screening

\*Case managers must follow all Immediate Engagement requirements as outlined in the State Immediate Engagement Policy which was revised on 2/24/09 (available on Worksmart).

### **CAP Case Management Reminders**

- Toolbox should accurately convey client's progress through program
- Review Toolbox scheduler/tasks daily
- Clear, concise case notes
- Mandatory 30 day contacts are required for all services except for unsubsidized paid employment. Due to entering actual hours, case managers should be in contact with clients more than every 30 days.
- Medical Temporary Waivers and 3<sup>rd</sup> trimester pregnancy waivers (with appropriate documentation) do not require 30 day contact but must be re-verified at the end date on Doctor's excuse.
- Progress of overcoming barriers should be addressed and documented every 30 days until resolved.
- Case Managers are responsible for adding case notes and entering actual hours on all clients who are in services. This includes clients that have been referred for conciliation/sanctioning.
- Actual hours can and should be entered back to October 1, 2008 if the CAP case is still active. Zeros should be immediately entered if the client did not return timesheets/logs. Zeroes can be changed at a later date if attendance sheet/job search logs are submitted. This is State mandated.
- Case Managers **must** keep track of sanction appointments for pre-enrollment (call-in letter) clients. If the client does not come in for this appointment, this should be documented in case notes and a request to send the sanction alert should be sent to supervisor. Once approved, the sanction alert should be sent in a timely manner. If the alert is not sent within 10 days, a free form sanction letter must be generated and mailed to client with a new appointment.
- Services should be entered, ended, and documented in case notes in an accurate and timely manner. Please remember to document in case notes why a service is opened or ended.

- Before sending the Unable to Locate Alert, all efforts must be exhausted (i.e. contacting FSD to see if they have new information, phoning the client and additional supports, etc...)
- Verification of employment should be documented thoroughly in case notes and marked verified in Toolbox.
- Document in case notes what was updated on the Employment Plan and Assessment.
- Supervisor approval must be requested and received before sending the sanction alert or placing the client in a Childcare or Transportation Temporary Waiver. Please make sure and document all requests and approvals/denials in case notes.
- Lack of participation needs to be discussed with client and documented in Toolbox.
- Additional contact is no longer required to be made during the conciliation process.
- Client's record should be reviewed periodically to update changes as needed.
- AWEP/CWEP hours must be recalculated monthly due to possible changes in hours. Calculations should be documented in case notes and updated on the employment plan. If the calculated hours are more than the client's required hours, the client is only required to participate for the required hours.
- If a client is not submitting attendance sheets as required for AWEP/CWEP, Community Service or Subsidized Employment in order to enter actual hours, the contract should be terminated (please see new form participant and worksite must sign upon other agreement forms).
- For unsubsidized employment, the Case Manager should verbally contact the employer two weeks after verification if the client does not return attendance sheets. This must be done to project out the actual hours for 6 months. Conciliation will not be ended and sanctions will not be lifted if the actual hours have not been entered.
- All other CAP services, including Voc Ed, GED, High School, etc., should be the client's responsibility to submit attendance sheets. If they do not, they should be referred for conciliation. It is the Case Manager or Subcontractor's discretion as to whether they track down the client's actual hours for these services.
- Case notes should specifically state when an attendance sheet is received or the date a client is supposed to return to the office with the attendance sheet. This will help when reviewing clients' records.

- **If a client's case closes because of subsidized paid employment, case notes should be entered if the client quit the employment, or will continue until the end of the contract for monitoring purposes.**