

Attachment A
General Instructions:

<p><u>Each State must provide the information indicated below on its TANF program regardless of the funding source -- i.e., no matter whether the State used segregated Federal TANF funds, segregated State TANF funds, or commingled funds to pay for the benefit or service.</u></p>
<p><u>If the State elects to report on other benefits or activities provided through other program funding streams, please mention it after the TANF-funded benefits or activities for each item.</u></p>
<p>1. The State's definition of each work activity. See attached</p>
<p>2. A description of the transitional services provided to families no longer receiving assistance due to employment. See attached</p>
<p>3. A description of how a State will reduce the amount of assistance payable to a family when an individual refuses to engage in work without good cause pursuant to 45 CFR 261.14 of this chapter. See attached</p>
<p>4. The average monthly number of payments for child care services made by the State through the use of disregards, by the following types of child care providers:</p>
<p><u>i. Licensed/regulated in-home child care: 0</u></p>
<p><u>ii. Licensed/regulated family child care: 0</u></p>
<p><u>iii. Licensed/regulated group home child care: 0</u></p>
<p><u>iv. Licensed/regulated center-based child care: 0</u></p>
<p><u>v. Legally operating (i.e., no license category available in State or locality) in-home child care provided by a non-relative: 0</u></p>
<p><u>vi. Legally operating (i.e., no license category available in State or locality) in-home child care provided by a relative: 0</u></p>
<p><u>vii. Legally operating (i.e., no license category available in State or locality) family child care provided by a non-relative: 0</u></p>
<p><u>viii. Legally operating (i.e., no license category available in State or locality) family child care provided by a relative: 0</u></p>
<p><u>ix. Legally operating (i.e., no license category available in State or locality) group child care provided by a non-relative: 0</u></p>
<p><u>x. Legally operating (i.e., no license category available in State or locality) group child care provided by a relative: 0</u></p>
<p><u>xi. Legally operated (i.e., no license category available in State or locality) center-based child care. 0</u></p>
<p>5. If the State has adopted the Family Violence Option and wants Federal recognition of its good cause domestic violence waivers under 45 CFR 260.50-58, then provide (a) a description of the strategies and procedures in place to ensure that victims of domestic violence receive appropriate alternative services and (b) an aggregate figure for the total number of good cause domestic waivers granted.</p>

See attached

6. A description of any nonrecurrent, short-term benefits (as defined in 45 CFR 260.31(b)(1)) provided, including:

i. The eligibility criteria associated with such benefits, including any restrictions on the amount, duration, or frequency of payments;

ii. Any policies that limit such payments to families that are eligible for TANF assistance or that have the effect of delaying or suspending a family's eligibility for assistance;

iii. Any procedures or activities developed under the TANF program to ensure that individuals diverted from assistance receive information about, referrals to, or access to other program benefits (such as Medicaid and food stamps) that might help them make the transition from welfare to work.

See attached

7. A description of the grievance procedures the State has established and is maintaining to resolve displacement complaints, pursuant to section 407(f)(3) of the Social Security 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.

See attached

8. A summary of State programs and activities directed at the third and fourth statutory purposes of TANF (as specified at 45 CFR 260.20(c) and (d) of this chapter).

a. Summarize below, the State programs and activities directed at preventing and reducing the incidence of out-of-wedlock pregnancies and establishing annual numerical goals for preventing and reducing the incidence of these pregnancies (TANF purpose 3):

See attached

b. Summarize below, the State programs and activities directed at encouraging the formation and maintenance of two-parent families (TANF purpose 4):

See attached

9. An estimate of the total number of individuals who have participated in subsidized employment under §261.30(b) or (c) of this chapter. 99

Attachment B 0
Grantee Information

<u>State</u> VERMONT	<u>Fiscal Year</u> 2010
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Program Information

<u>Provide the following information for EACH PROGRAM (according to the nature of the benefit or service provided) for which the State claims MOE expenditures. Complete and submit this report in accordance with the attached instructions.</u>
<u>1. Name of Benefit or Service Program:</u> See attached
<u>2. Description of the Major Program Benefits, Services, and Activities:</u> See attached
<u>3. Purpose(s) of Benefit or Service Program:</u> See attached
<u>4. Program Type. (Check one)</u> <input checked="" type="radio"/> TANF <input type="radio"/> State
<u>5. Description of Work Activities (Complete only if this program is a separate State program):</u> See attached
<u>6. Total State Expenditures for the Program for the Fiscal Year:</u> \$78,727,662
<u>7. Total State MOE Expenditures under the Program for the Fiscal Year:</u> \$36,978,841
<u>8. Total Number of Families Served under the Program with MOE Funds:</u> 2,893 <u>This last figure represents (Check one):</u> <input checked="" type="radio"/> The average monthly total for the fiscal year. <input type="radio"/> The total served over the fiscal year.
<u>9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services:</u> See attached
<u>10. Prior Program Authorization: Was this program authorized and allowable under prior law? (Check one)</u> <input checked="" type="radio"/> Yes <input type="radio"/> No
<u>11. Total Program Expenditures in FY 1995 (NOTE: Provide only if response on question 10 is No):</u> \$0

This certifies that all families for which the State claims MOE expenditures for the fiscal year meet the State's criteria for "eligible families."

Signature  Certification
Certify:

Name Mary A. Alligood

Title Financial Manager III

Date Submitted 12/23/2010

Approved OMB No. 0970-0248 Form ACF-204, expires 04/30/2009.

ATTACHMENT

Attachment B

Revised Annual Report on State Maintenance-of-Effort Programs: Form ACF-204

State Vermont

Fiscal Year 2010

Date Submitted December 2010

Provide the following information for **EACH PROGRAM** (according to the nature of the benefit or service provided) for which the State claims MOE expenditures. Complete and submit this report in accordance with the attached instructions.

1. Name of Benefit or Service Program

a.) Reach Up (RU)

b.) Reach Up Separate State Program Component (RUSSP)

c.) Emergency Assistance (EA)

d.) Child Care (CC)

e.) Reach Ahead (RA)

f.) Boys & Girls Clubs of Vermont Afterschool Programs (B&GC)

g.) Emergency Food Collaboration with Vermont Foodbank

h.) Summer / Back-to-School Food Benefit

i.) Subsidized Employment Program

2. Description of the Major Program Benefits, Services, and Activities:

a.) Reach Up

Vermont's TANF financial assistance program, Reach Up, provides transitional assistance and support services to needy families with (or expecting) children. Adults in participating families who are receiving financial assistance must participate in a services component of the program. Adult participants who can work are required to engage in work or work activities. Using a case management model, the department provides eligible families with support services and opportunities designed to address the families' needs that are related to gaining and maintaining unsubsidized employment and moving the family toward self-sufficiency.

b.) Reach Up Separate State Program Component

Vermont's Reach Up Separate State Program Component is a financial assistance program identical to Reach Up in that it provides transitional assistance and support services to needy families with (or expecting) children. Adults in participating families who are receiving financial assistance must participate in a services component of the program to the degree that they are meeting federal work requirements. Adult participants who can work are required to engage in work or work activities. Using a case management model, the department provides eligible families with support services and opportunities designed to address the families' needs that are related to gaining and maintaining unsubsidized employment and moving the family toward self-sufficiency. These families are transitioning back from sanctions due to compliance with program requirements.

c.) Emergency Assistance

The Emergency Assistance Program provides financial assistance to meet short-term or nonrecurring needs experienced by families in emergency situations. Benefits include back rent, mortgage assistance, utility assistance, temporary housing and rent assistance.

d.) Child Care

Vermont provides subsidies that cover part or all of child care expenses for children under the age of 13 to help families achieve or maintain economic self-sufficiency.

e.) Reach Ahead

Reach Ahead provides financial assistance in the amount of \$100 for the first six and \$50 for the second six months for the purchase of food by families who no longer qualify for Vermont's regular financial assistance programs because they are over income due to meeting their federal TANF work requirement in paid employment. Families are also eligible for case management and support services related to job retention and advancement.

f.) Boys & Girls Clubs of Vermont Afterschool Programs (B&GC)

In an agreement with the State of Vermont, and for a nominal fee, the Boys & Girls Clubs of Vermont help to support low-income families during critical after school hours, by providing children and teens with care and access to enrichment and education programs at clubs throughout the state. The collaboration with the state and the Boys and Girls Clubs is in accordance with and memorialized in a contract agreement between the state and the Boys and Girls Clubs of Vermont.

g.) Emergency Food Collaboration with Vermont Foodbank

A partnership between the Foodbank and the Department for Children and Families (DCF) provides an emergency food benefit to needy families with minor children. In accordance with an agreement, the DCF committed funds used to purchase value foods for distribution as a short-term, non-recurring benefit and the Foodbank committed specified non-federal and non-federally matched TANF expenditures to Vermont to claim as maintenance of effort. This MOE claim represents the Foodbank's expenditures and in-kind effort to provide emergency food to needy families with minor children as a non-recurrent short-term benefit. The claimed expenditure is limited to short-term (four or fewer months) emergency food benefits that are provided to needy families. The amount and the TANF recipient group are determined by relying on data from the Hunger in America Survey. The claim is limited to the 33 percent of those accessing food shelves that are families with children, the 86 percent of that group that are needy as they have household income at or below 185 percent of the federal poverty level (FPL), and the 62 percent of that group that utilized the food shelves for four or fewer months.

h.) Summer / Back-to-School Food Benefit

The Summer / Back-to-School food benefit was a one-time food purchase benefit issued on eligible families' electronic benefit transaction (EBT) card. It was designed to address the crisis need of the 23,000 Vermont children under 18 who live in food insecure households by providing a one-time, short-term non-recurrent food benefit. This benefit is for needy families with minor children. The needy determination for eligibility of the families is based upon the families' eligibility for 3SquaresVT (Vermont's SNAP program). The benefit was distributed only to households already determined eligible for the 3SquaresVT benefit and including at least one minor child. The benefit was accessible to the family for the month of September 2010. This second benefit was made possible in part due to the partnership between the DCF, the Vermont Foodbank, and the Vermont Community Foundation.

3. Purpose(s) of Benefit or Service Program:

a.) Reach Up

To provide financial assistance to needy families and help families move toward self-sufficiency. 45 C.F.R. § 260.20(a)-(b).

b.) Reach Up Separate State Program Component

To provide financial assistance to needy families and help families move toward self-sufficiency. 45 C.F.R. § 260.20(a)-(b).

c.) Emergency Assistance

To provide financial assistance to meet short-term or nonrecurring needs experienced by families in emergency situations. 45 C.F.R. § 260.2 (a).

d.) Child Care

To help families pay for child care they need to achieve or maintain economic self-sufficiency. 45 C.F.R. § 260.20 (b).

e.) Reach Ahead

To provide financial assistance in the form of a food benefit and work-related support services for a limited period of time to provide additional financial stability and moderating the cliff for families who are in the process of transitioning off of financial assistance.

45 C.F.R. § 260.20 (a).

f.) Boys & Girls Clubs of Vermont Afterschool Programs

These programs provide supervision for children that enable needy parents to work, seek employment, or participate in job preparation activities. It is also expected that because these programs provide structured, productive activities for youth during out-of-school time they help to prevent high-risk behavior that can lead teen and out-of-wedlock pregnancies. 45 C.F.R. § 260.20 (b) and (c).

g.) Emergency Food Collaboration with Vermont Foodbank

To provide financial assistance to meet short-term or nonrecurring needs experienced by families in emergency situations. 45 C.F.R. § 260.2 (a).

h.) Summer / Back-to-School Food Benefit

To provide financial assistance to meet short-term or nonrecurring needs experienced by Families in emergency situations. 45 C.F.R. § 260.2 (a).

4. Program Type. (Check one)

a.) Reach Up

This Program is operated under the TANF program.

This Program is a separate State program.

b.) Reach Up Separate State Program Component

This Program is operated under the TANF program.

This Program is a separate State program.

c.) Emergency Assistance

This Program is operated under the TANF program.

This Program is a separate State program.

d.) Child Care

This Program is operated under the TANF program.

This Program is a separate State program.

e.) Reach Ahead

This Program is operated under the TANF program.

This Program is a separate State program.

f.) Boys & Girls Clubs of Vermont Afterschool Programs ¹

This Program is operated under the TANF program.

This Program is a separate State program.

g.) Emergency Food Collaboration with Vermont Foodbank.²

This Program is operated under the TANF program.

This Program is a separate State program.

h.) Summer / Back-to-School Food Benefit³

This Program is operated under the TANF program.

This Program is a separate State program.

i.) Subsidized Employment Program

¹ This expenditure is claimed in accordance with 45 C.F.R. §263.2(e) and is funded by non-governmental funds of the Boys & Girls Clubs of Vermont.

² This expenditure is claimed in accordance with 45 C.F.R. §263.2(e) and is funded in part by non-governmental funds of the Vermont Foodbank.

³ This expenditure is claimed in accordance with 45 C.F.R. §263.2(e) and is funded in part by non-governmental funds of the Vermont Community Foundation and the Vermont Foodbank.

X This Program is operated under the TANF program.

 This Program is a separate State program.

5. Description of Work Activities (Complete only if this program is a separate State program):

Reach Up Separate State Program Component – This program has the same work activities as in Vermont’s TANF program, Reach Up.

Reach Ahead – This program’s sole work activity is paid employment. The adult(s) in the family must be meeting the federal TANF work requirement hours in paid employment to qualify for the program.

6.) Total State Expenditures for the Program for the Fiscal Year: \$78,727,662

a.) Reach Up	\$26,208,042
b.) Reach Up SSP Component	\$ 1,034,022
c.) Emergency Assistance	\$ 4,356,717
d.) Child Care	\$ 21,707,022
e.) Reach Ahead	\$ 159,805
f.) Boys & Girls Club	\$ 1,415,686
g.) Foodbank Collaboration	\$ 368,922
h.) Summer Food benefit	\$ 3,565,439
i.) Subsidized Employment ⁴	\$
j.) EITC	\$ 19,912,007

7. Total State MOE Expenditures under the Program for the Fiscal Year: \$36,978,841

⁴ The subsidized employment expenditure is included in the Reach Up expenditure; the total subsidized employment expenditure was \$413,016.

a.) Reach Up	\$18,263,257
b.) Reach Up SSP Component	\$ 1,034,022
c.) Emergency Assistance ⁵	\$ (260,891)
d.) Child Care	\$15,580,090
e.) Reach Ahead	\$ 159,805
f) Boys & Girls Club	\$ 1,415,686
g.) Foodbank Collaboration	\$ 73,784
h.) Summer Food benefit	\$ 713,088
i.) Subsidized Employment ⁶	

8. Total Number of Families Served under the Program with MOE Funds:

a.) Reach Up 2893

This last figure represents (check one):

The average monthly total for the fiscal year.

The total served over the fiscal year.

b.) Reach Up SSP Component 260

This last figure represents (check one):

The average monthly total for the fiscal year.

⁵ The Emergency Assistance expenditure does not reflect actual expenditures for benefits due to inclusion of insurance settlement in that line.

⁶ The subsidized employment expenditure is included in the Reach Up expenditure; the total MOE for subsidized employment is \$69,576.

The total served over the fiscal year.

c.) Emergency Assistance 176

This last figure represents (check one):

The average monthly total for the fiscal year.

The total served over the fiscal year.

d.) Child Care 4,341

This last figure represents (check one):

The average monthly total for the fiscal year.

The total served over the fiscal year.

e.) Reach Ahead 138

This last figure represents (check one):

The average monthly total for the fiscal year.

The total served over the fiscal year.

f.) B&GC _____

This last figure represents (check one):

_____ The average monthly total for the fiscal year.

_____ The total served over the fiscal year.

g.) Foodbank Collaboration _____

This last figure represents (check one):

_____ The average monthly total for the fiscal year.

_____ The total served over the fiscal year.

h.) Summer / Back-to-School benefit 15,799

This last figure represents (check one):

_____ The average monthly total for the fiscal year.

X The total served over the fiscal year.

i.) Subsidized Employment 99

This last figure represents (check one):

_____ The average monthly total for the fiscal year.

X The total served over the fiscal year.

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services:

a.) Reach Up

In general, families participating in the Reach Up Program must meet the following financial eligibility criteria:

- cooperation with child support enforcement and welfare-to-work requirements as well as other procedural requirements such as providing verification and appearing for eligibility interviews;
- countable resources at or below \$2000; and
- countable income below payment standards calculated by (1) adding countable housing expenses up the maximum allowance for the county of residence to the basic needs allowance for the family size, (2) multiplying the sum by the ratable reduction percentage, and (3) rounding the result down. The allowances in effect during FFY 2010 were:

Housing maximum allowance

\$400 outside Chittenden County
\$450 inside Chittenden County

Basic Needs Allowance by Household Size

\$ 475 1 person
\$ 680 2 persons
\$ 891 3 persons
\$1064 4 persons
\$1247 5 persons
\$1372 6 persons
\$1589 7 persons
\$1769 8 persons
\$ 170 each additional
 person
Ratable reduction percentage 49.6 %

b.) Reach Up Separate State Program Component

Families participating in the Reach Up Separate State Program Component must meet the same financial eligibility criteria as Reach Up participants as set out above.

c.) Emergency Assistance

Generally, families receiving EA for non-catastrophic emergency needs must meet the following financial criteria: (1) no resources available to meet the emergency need; and (2) countable income below Reach Up payment levels as noted above. Families receiving EA for an emergency need such as rental or mortgage arrearage assistance must have explored and pursued all alternatives for addressing the need and have exhausted all income and resources.

d.) Child Care

Child care subsidies are available to families participating in the RU program and working families with minor children who meet the low-income guidelines and qualify for a child care subsidy.

e.) Reach Ahead

Families participating in the Reach Ahead Separate State Program Component must have met Reach Up financial eligibility criteria (as noted above in a.) and been in either Vermont's Reach Up program or its Postsecondary Education program (which has the same eligibility requirements as Reach Up) within 6 months of having qualified for Reach Ahead.

f.) Boys & Girls Clubs

Families and children who participate in and benefit from the Boys & Girls Club activities are limited to the percentage of participants who are eligible for the national free and reduced breakfast and lunch program.

g.) Foodbank Collaboration

Families qualifying for food benefits from the Foodbank were limited to those low-income families financially eligible for Vermont's SNAP program, included a minor child, and were accessing food assistance for four or fewer months.

h.) Summer / Back-to-School Benefit

Families qualifying for this benefit had to be eligible for and participating in Vermont's SNAP program and include at least one minor child in the household.

i.) Subsidized Employment

Families participating in the subsidized employment program must meet all Reach Up eligibility criteria.

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

a.) Reach Up

Yes X No

b.) Reach Up Separate State Program Component

Yes X No

c.) Emergency Assistance

Yes X No

d.) Child Care

Yes X No

e.) Reach Ahead

Yes X No

f.) Boys & Girls Clubs

Yes No X

g.) Foodbank Collaboration

Yes No X

h.) Summer / Back-to-School Benefit

Yes No X

i.) Subsidized Employment

Yes X No _____

11. Total Program Expenditures in FY 1995: The Boys & Girls Clubs activities, Foodbank Collaboration, and the Summer / Back-to-School benefits are referenced for reporting purposes for MOE, but they are not funded with state funds and are not subject to the new spending provision. _____

(NOTE: provide only if response on question 10 is No)

This certifies that all families for which the State claims MOE expenditures for the fiscal year meet the State's criteria for "eligible families."

SIGNATURE: _____

NAME: _____

TITLE: _____

Attachment A

Annual Report On TANF Programs Under 45 CFR 265.9(b)

General Instructions:

Each State must provide the information indicated below on its TANF program regardless of the funding source -- i.e., no matter whether the State used segregated Federal TANF funds, segregated State TANF funds, or commingled funds to pay for the benefit or service.

If the State elects to report on other benefits or activities provided through other program funding streams, please mention it after the TANF-funded benefits or activities for each item.

(1) The State's definition of each work activity.

The TANF regulations at 45 CFR 261.30 set forth the 12 categories of work activities listed in Section 407(d) of the Social Security Act for purposes of determining the State's required minimum work participation rate(s). The TANF regulations at 45 CFR 261.2 provide the relevant definitions of the 12 work activities. Therefore, please indicate the activities that fall within each category or work activity.

Unsubsidized Employment

Unsubsidized employment is a job with wages or self-employment income not subsidized with Reach Up or any other public funds. Employment is considered subsidized if the employer, rather than the employee, receives a subsidy from TANF or any other public program.

Subsidized Employment

Subsidized private employment is a job in the private sector, other than on-the-job training, that pays wages subsidized with Reach Up or other public funds or for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a participant. Subsidized employment includes supported employment for individuals who have disabilities when it is supported with TANF or public funds. Subsidized public employment is the same as subsidized private employment in all respects except that the job is in a public sector employment setting.

Work Experience

Work experience is an activity to improve the employability of those individuals who have not been able to find full-time unsubsidized employment. This activity should help the participant establish a good work

record and develop good work habits and skills. The type of skills a participant might develop in this activity include learning how to follow instructions, work independently, be a reliable worker, maintain a work schedule and improve work habits.

On-the-Job Training

On-the-job training (OJT) is an activity with ongoing supervision in which the participant receives training essential to the full and adequate performance of a job while engaged in productive work. The participant must be a paid employee during the time the participant spends in OJT. A paid apprenticeship is a type of on-the-job training.

Job Search and Job Readiness Assistance

Job search includes identifying suitable job openings, making contact with potential employers, applying and interviewing for jobs, and traveling between job interviews. Job readiness includes activities designed to prepare a participant to seek, obtain, and retain employment, such as resume and application preparation; work search training, interview skills training, training in work place expectations, and life skills training; substance abuse treatment, mental health treatment or rehabilitation activities when there is documentation that such activities have been determined to be necessary and certified by a qualified medical and mental health professional.

Community Service Programs

Community service programs are structured activities monitored by the case manager or other entity. Community service placements provide a direct benefit to the community or members of the community and also provide participants with the opportunity to maintain their employment skills as well as to demonstrate their employment potential when they have been unable to obtain subsidized or unsubsidized work. The placement may also provide training and experience designed to enhance the participant's skills. Placements are located at public or nonprofit sites with local supervision on an ongoing basis.

Vocational Educational Training

Vocational educational training is an organized educational program designed to provide the participant with skills or certification in a specific area of study that prepares the participant for employment in a

current or emerging occupation requiring training. It includes participation in a postsecondary degree program. Basic and remedial education and English as a Second Language embedded in vocational educational training are counted as vocational educational training when the vocational educational institution provides such activities and requires them for successful completion of the vocational educational training program.

Job Skills Training Directly Related to Employment

Job skills training means education or training that enables the participant to become proficient in an occupation or skill necessary to meet the participant's employment goal. The jobs skills training must be directly related to employment.

Education Directly Related to Employment, in the Case of a Recipient Who Has Not Received a High School Diploma or a Certificate of High School Equivalency

Education directly related to employment includes basic and remedial education that will provide an individual with basic literacy equivalent to at least grade 8.9 and education in English proficiency when an individual is unable to understand, speak, read, or write the English language at a level necessary to obtain employment consistent with the participant's employment goal. It also includes education related to a specific occupation, job, or job offer.

Satisfactory Attendance at Secondary School or in a Course of Study Leading to a Certificate of General Equivalence, in the Case of a Recipient Who Has Not Completed Secondary School or Received Such a Certificate

Satisfactory attendance at secondary school or a course of study leading to a Certificate of general equivalency includes education designed to prepare a person to qualify for a high school diploma or high school equivalent; and a secondary school program.

Providing Child Care Services to an Individual Participating in a Community Service Program

The activity of providing child care services that enable another TANF or SSP-MOE recipient to participate in a community service program. Participation in this activity is unpaid and must be done with ongoing supervision. Such structured placements are developed in conjunction with the development of a community service program work site, subject to the terms of the work site agreement.

- (2) A description of the transitional services provided to families no longer receiving assistance due to employment.

Indicate the kinds of help provided to working families that received, but no longer receive, "assistance" as defined in 45 CFR 260.31.

Eligible families who are no longer receiving financial assistance from Reach Up (Vermont's TANF program) due to employment are provided with the following transitional services:

- Transitional Medicaid benefits are continued for up to 36 months.
- Child care subsidies are continued on a sliding fee scale basis.
- Reach Up participants who obtain unsubsidized employment are eligible to receive job retention and enhancement services.
- Participants who are no longer eligible for Reach Up financial assistance continue to be eligible for these services for up to six consecutive months following grant closure due to wages from employment. The services provided may include coaching and encouragement, referrals to community resources, education and training, and the range of support services provided to Reach Up participants who are meeting their work requirement through unsubsidized employment during their employment phase.

- (3) A description of how a State will reduce the amount of assistance payable to a family when an individual refuses to engage in work without good cause pursuant to 45 CFR 261.14 of this chapter.

When a Reach Up participant refuses to engage in work without good cause, the participant's family grant is reduced by \$75 per month for each of the first three months of noncompliance. If the participant continues to refuse to engage in work for more than three months, the family's grant is reduced by \$150 per month. In the event that a participant has been sanctioned 12 months and has received 60 or more cumulative months of assistance, the family's grant is reduced by \$225 per month.

All reductions in the family grant for a participant's failure to engage in work are per participant. When two parents in a family both have work requirements and refuse to engage in work, the family's grant is reduced for each parent's act of noncompliance. Participants who are subject to financial sanctions must meet with their case manager at least once a month. A parent's failure, without good cause, to keep an appointment with the case manager when the family grant is being reduced due to a refusal to engage in work may result in termination of financial assistance to the family.

- (4) The average monthly number of payments for child care services made by the State through the use of disregards, by the following types of child care providers:

Vermont pays for child care services through direct payments to providers, not through the use of disregards. Because the subsidies are funded from the Child Care and Development Fund to which the state has transferred TANF funds, no numbers are reported in this section.

- (i) Licensed/regulated in-home child care
None;
- (ii) Licensed/regulated family child care
None;
- (iii) Licensed/regulated group home child care
None;
- (iv) Licensed/regulated center-based child care
None;
- (v) Legally operating (i.e., no license category available in State or locality) in-home child care provided by a non-relative
None;
- (vi) Legally operating (i.e., no license category available in State or locality) in-home child care provided by a relative
None;
- (vii) Legally operating (i.e., no license category available in State or locality) family child care provided by a non-relative
None;

(viii) Legally operating (i.e., no license category available in State or locality) family child care provided by a relative
None;

(ix) Legally operating (i.e., no license category available in State or locality) group child care provided by a non-relative
None;

(x) Legally operating (i.e., no license category available in State or locality) group child care provided by a relative
None; and

(xi) Legally operated (i.e., no license category available in State or locality) center-based child care
None.

- (5) If the State has adopted the Family Violence Option and wants Federal recognition of its good cause domestic violence waivers under 45 CFR 260.50-58, then provide (a) a description of the strategies and procedures in place to ensure that victims of domestic violence receive appropriate alternative services and (b) an aggregate figure for the total number of good cause domestic waivers granted.

The total number of federally recognized good cause domestic violence waivers granted equals the number actually granted during the fiscal year of this report plus any granted in a prior fiscal year that are still in effect during the fiscal year of this report

Vermont has adopted the Family Violence Option. Program rules include the following requirements:

- At the time of a participant's application for and redetermination of eligibility for the Reach Up Program, field staff must explain to the participant that he or she may request a deferment from the work requirement and a waiver from the requirement to cooperate with child support enforcement if the family is suffering the effects of domestic violence. Applicants and participants are also provided with general information about domestic violence and a toll-free domestic violence hot-line number.

- Upon request, field staff can provide a referral to a local domestic violence program and help an individual apply for the waiver or deferment, or both.
- Case managers working with a Reach Up Program family experiencing the effects of domestic violence must incorporate activities that address the family's domestic violence situation into the family development plan.

All members of the Reach Up Program's field staff receive training designed to help them to recognize the signs of domestic violence and work with victims of domestic violence.

During FFY 2010, Vermont had 8 federally recognized good cause domestic waivers granted or in place after having been granted in a prior fiscal year and 313 waivers of the child support requirements were approved or in place having been approved in a prior fiscal year.

- (6) A description of any nonrecurrent, short-term benefits (as defined in 45 CFR 260.31(b)(1)) provided, including:
- (i) The eligibility criteria associated with such benefits, including any restrictions on the amount, duration, or frequency of payments;

The department's TANF program authorizes emergency assistance (previously referred to as ANFC-EA) for essential needs the family is unable to meet due to a catastrophic situation or circumstances in which the family's income and resources are exhausted. This program is funded with TANF funds and State MOE. Vermont preserves its authority (Title IV-A, section 404(a)(2) of the Social Security Act) to continue activities under the former ANFC-EA plan in effect as of September 30, 1995. Any activities Vermont engages in under this grandfather authority are funded with segregated TANF funds.

Vermont provides families with dependent children TANF-funded Emergency Assistance (EA) benefits to address specific short-term (not to exceed 4 months) crisis need that the family could not have avoided and that cannot be met without the department's intervention.

A family may qualify for EA in one of two ways, by meeting either the non-catastrophic or the catastrophic rules.

Non-catastrophic eligibility criteria include:

1. The applicant family includes a dependent child in the household;
2. the family has applied any available resources toward meeting the emergency need; a family with resources in excess of the emergency need is not eligible for EA; and
3. the family's income is less than the Reach Up payment standard for a family of comparable size with the same housing costs.

Catastrophic eligibility criteria include:

1. The applicant family includes a dependent child in the household;
2. the family experienced a catastrophic situation such as natural disasters, death of a spouse or child, medical emergency and constructive evictions (including domestic violence); and
3. the family has exhausted all income and resources.

Benefits issued under the EA program include: vendor payments for housing costs up to a set maximum, back rent and mortgage arrears that will prevent homelessness, payment of utility bills, minimum heating fuel delivery, and cash benefit for food and personal needs.

Vermont implemented its diversion program, Reach First, in July 2008. Eligible families may receive a financial benefit linked to financial need directly related to the family's immediate financial crisis. Total Reach First payments are limited to no more than the cumulative equivalent of four months of financial assistance for which the family would have qualified in Reach Up, Vermont's financial assistance program, minus child support received. Reach First payments may be made in monthly installments or, in rare circumstances and when necessary, payment(s) in excess of the equivalent of the family's monthly Reach Up payment.

To qualify for Reach First, the applicant family must qualify for Reach Up using Reach Up financial eligibility rules. The applicant family must meet the Reach First eligibility criteria and must have either members who are mandatory applicants or choose to participate in Reach First. Mandatory Reach First applicants must report to the Vermont Department of Labor within two working days of filing an application for assistance to be eligible for Reach First. Each applicant undergoes a financial and self-sufficiency screening to determine the extent of the family's financial need, the likelihood that Reach First can address the family's needs within the program's time limits, and the family's prospects for and likelihood of self-sufficiency within the next four months, among other considerations. Families who participated in the Reach First program in the past 12 months or who need on-going assistance beyond the four-month Reach First period are not eligible for the program.

- (ii) Any policies that limit such payments to families that are eligible for TANF assistance or that have the effect of delaying or suspending a family's eligibility for assistance; and

Any Reach First payment received by the family for a specific month is counted as income for eligibility and benefit determination in other of the State's basic needs benefits programs. The result is that a family receiving Reach First benefits attributed to a specific month is not eligible for Reach Up financial assistance in that same month.

- (iii) Any procedures or activities developed under the TANF program to ensure that individuals diverted from assistance receive information about, referrals to, or access to other program benefits (such as Medicaid and SNAP benefits) that might help them make the transition from welfare to work.

Applicants for Emergency Assistance are advised of the other programs, such as Vermont's SNAP and Medicaid programs, and encouraged to fill out the universal application for these programs.

Reach First applicants attend a mandatory personal interview and orientation to Reach First and are provided with information about all programs administered by the department, services and referrals available to the family, program requirements, participant responsibilities, consequences of failure to meet responsibilities, and incentives for participation and obtaining employment. Reach First applicants use the department's universal application that includes information about and application for Medicaid and 3SquaresVT (Vermont's SNAP program).

- (7) A description of the grievance procedures the State has established and is maintaining to resolve displacement complaints, pursuant to section 407(f)(3) of the Social Security 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.

Vermont's work site agreements require the work site to comply with the Department for Children and Families Economic Services Division's (ESD) rules on the work place displacement policy. The rules state that no adult in a Reach Up Program work activity that is funded, in whole or in part, by funds provided by the federal government shall be employed or assigned when:

- any other individual at the same work site is on layoff from the same or any substantially equivalent job;
- the employer has terminated the employment or reduced the regularly scheduled hours of any regular full-time employee or otherwise caused an involuntary reduction of its work force capacity to fill the vacancy so created with a participant of the Reach Up Program; or
- the employment or placement is the result of a strike, lockout, or other bona fide labor dispute.

If there is a bargaining unit at the work site, ESD or its agent shall obtain the bargaining unit's certification that the participant's employment or placement will not result in any violation of the bargaining unit agreement.

ESD shall maintain a grievance procedure for resolving complaints of alleged violations of the department's displacement policy. This procedure will involve the opportunity for informal resolution conducted by the Reach Up Welfare-to-Work Director or the director's designee. If no informal resolution can be reached within 30 days, the complainant may file a request for a hearing with the state.

The state's grievance procedure shall involve a hearing before a Vermont Department of Labor Appeals Referee. The state shall provide the complainant with a written decision within 90 days from the date of the filing of the complaint. A dissatisfied party may appeal a decision by the state within 20 days of receipt of the state's written decision.

This displacement policy has been formally incorporated into ESD's rules manual through the administrative rules process set forth in Vermont statute. This process provided for formal publication of the proposed rule and an opportunity for public comment.

- (8) A summary of State programs and activities directed at the third and fourth statutory purposes of TANF (as specified at 45 CFR 260.20(c) and (d) of this chapter).
- a. Summarize below, the State programs and activities directed at preventing and reducing the incidence of out-of-wedlock pregnancies and establishing annual numerical goals for preventing and reducing the incidence of these pregnancies (TANF purpose 3):*

Sec. 260.20 (c): Vermont's efforts at reducing out-of-wedlock pregnancies are described in the TANF State Plan at (a)(1)(A)(v).

b. Summarize below, the State programs and activities directed at encouraging the formation and maintenance of two-parent families (TANF purpose 4):

Sec. 260.20 (d): On July 1, 1994, Vermont initiated the Welfare Restructuring Project (WRP), a section 1115 waiver demonstration project. One of the most significant provisions of WRP was the elimination of the "100-hour rule." As a result of this rule, families with two able-bodied parents were ineligible for benefits when the breadwinner worked 100 or more hours in a month. On July 1, 2001, when Vermont replaced WRP with Reach Up, its TANF program, the Vermont General Assembly decided to maintain the elimination of the 100-hour rule. The elimination of this rule has allowed Vermont to continue to provide financial assistance to intact families until their income exceeds the TANF program's payment standard.

Vermont believes that the Reach Up Program's increased focus on work and the reciprocal responsibilities of parents and government, supported by strong case management, work together to strengthen families and help them deal with the stressors that can break them apart. Another incentive to work and encouragement for two-parent families is Vermont's earnings disregard which applies to the earnings of each individual adult instead of the household earnings; two-parent households can double the amount of disregarded earnings.

In addition, the Reach Up Program accommodates two-parent families' need for flexibility in fulfillment of parental and work obligations. This is accomplished by allowing the parents to choose to share work requirements and determine who will meet the hours of the family's work requirement. By leaving these decisions up to the families, Reach Up supports the family members' ability to structure their lives in a way that strengthens the family unit.

- (9) An estimate of the total number of individuals who have participated in subsidized employment under §261.30(b) or (c) of this chapter.

An estimated 99 individuals participated in subsidized employ