



## Department of Human Services

Division of Family Assistance  
Knud Hansen Complex, Building. A  
1303 Hospital Ground  
St. Thomas, Virgin Islands, 00802



February 15, 2010

Joanne Krudys  
Program Manager, Region II  
E-mail: [joanne.krudys@acf.hhs.gov](mailto:joanne.krudys@acf.hhs.gov)  
Administration for Children and Families  
26 Federal Plaza, Room 4114  
New York, NY 10278

Dear Ms. Krudys,

The Virgin Islands TANF program is resubmitting the corrected version of its *Annual Report on State MOE Programs: ACF-204* for FY 2010. Please find same attached.

We would like to thank the TANF Regional offices for guidance and assistance throughout FY 2010 and look forward to continued partnership in FY 2011.

Sincerely,

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Lennox Zamore,  
Administrator

C: Chris Finch  
Michal Rhymer-Charles  
Aracelis Del Ray  
Carmen Rogers-Green

***Annual Report on State MOE Programs: ACF-204***

***Submitted to***

***The Administration for Children and Families  
Regional Administrator***

***By***

***The United States Virgin Islands  
Department of Human Services***

Attachment A

**Annual Report on State Maintenance of Effort Programs: ACF- 204  
Under 45 CFR 265.9(b)**

**1. Definition of Work Activities**

**A. Core Activities**

- i. Unsubsidized Employment means full- or part-time employment in the public or private sector that is not subsidized by TANF or any other public program. Documentation and verification will be as follows:***
  - This activity includes all paid employment for which the recipients did not receive a TANF or other subsidy for participation.
  - Recipients whose employers claim a tax credit for hiring economically disadvantaged workers are considered to be in unsubsidized employment
  
- ii. Subsidized Private and Subsidized Public Sector Employment – Effective December 31, 2009, the VI Territory began the implementation of Subsidized Private and Public Sector Employment. Subsidized Employment is supervised employment in the private or public sector where, based a contract or grant award agreement, the employer receives a subsidy to offset the cost of wages and benefits paid to one or more TANF participants. The following is included in the definition of subsidized private or public sector employment:***
  - *Work Supplementation:* The participant's temporary cash assistance is diverted to the employer as a subsidy. The employer must pay the participants' wages that equal or exceed the minimum wage.
  - *Incentive Payments:* In an effort to encourage employers to employ program participants, the employer may be offered incentive payments to offset all or some of the cost of employment of TANF participants for an agreed period of time.
  - *Supportive Services:* The employer may be paid for the delivery of supportive services including mental health and substance abuse treatment, job search and training if the TANF participant is paid for these hours.
  - *Paid Supported Work:* Employers may be offered a subsidy for the employment of individuals with disabilities (as defined under the Rehabilitation Act of 1973 -29 U.S.C. 705 (35) in an integrated setting for wages consistent with those paid to non-disabled workers

performing similar job functions.

**iii. Work Experience (including work associated with the refurbishing of publicly assisted housing if sufficient private sector employment is not available) means a work activity, performed in return for welfare, that provides an individual with an opportunity to acquire the general skills, training, knowledge, and work habits necessary to obtain employment. The Fair Labor Standard Act (FLSA) applies.**

- TANF assistance provided to work experience participants is not considered wages for Social Security, Federal income tax, or Earned Income Tax Credit purposes.
- Substance abuse and mental health treatment/rehabilitation, basic training, education, and job-readiness activities do not count under this definition.

**iv. On-the-Job Training (OJT) means training in the public or private sector that is given to a paid employee while he or she is engaged in productive work and that provides knowledge and skills essential to the full and adequate performance of the job.**

- This activity does not include unpaid training activities or substance abuse, mental health treatment, rehabilitation activities, or educational activities even though the recipient is paid by the employer to attend.
- This activity is not synonymous with subsidized employment in that it is not employment and involves a written agreement delineating an occupation-based training plan for the participant.

**v. Job Search and Job Readiness Assistance means the act of seeking or obtaining employment, preparation to seek or obtain employment, including life skills training, and substance abuse treatment, mental health treatment, or rehabilitation activities (must be determined to be necessary and certified by a board certified or licensed medical or mental health professional) for those who are otherwise employable. Job Search and Job Readiness comprises two components as follow:**

- Preparing an individual to obtain employment, such as, looking for suitable job openings, making contact with potential employers, applying for vacancies, interviewing for jobs, preparing a resume or job application, instruction in interviewing skills, instruction in work place expectations, and life skills training.
- Substance abuse treatment, mental health treatment, or rehabilitation activities (including detoxification and inpatient treatment) for those who are otherwise employable. A

qualified addictions counselor, or board licensed physician or mental health professional must certify that treatment is necessary and indicate type, duration and frequency of treatment or provide a certification of fitness to engage in work activities. The Territory only counts an individual's actual hours of participation in treatment or rehabilitation activities. If a portion of the treatment or rehabilitation activities meets a common-sense definition of another work activity, then the hours associated with the work may count under the appropriate allowable work category.

**This activity conforms with the following 3 limitations:**

1. We count only six weeks in any fiscal year
2. of the six weeks above four must be consecutive
3. We count three to four days as a full week of participation, but only

vi. ***Community Service is structured programs and embedded activities in which TANF recipients perform work for the direct benefit of the community under the auspices of public or nonprofit organizations.***

- The Community service program was limited to projects that served a useful community purpose in fields such as health, social service, environmental protection, education, urban and rural redevelopment, welfare, recreation, public facilities, public safety, and child care.
- The Community service program is designed to improve the employability of recipients not otherwise able to obtain employment, and must be supervised on an ongoing basis no less frequently than daily. We take into account, to the extent possible, the prior training, experience, and skills of a recipient in making appropriate community service assignments.
- We will not count as Community Service any activity that does not provide a direct benefit to the community.
- This activity will exclude substance abuse treatment, mental health and family violence counseling, life skills and parenting classes, job readiness instruction and caring for a disabled household family member.
- The community service program does not include activities that meet the definition of another allowable TANF work activity and will be limited to structured activities that both provide a community service and also improve the employability of participants.
- Community Service excludes unstructured and unsupervised activities such as helping a neighbor or friend, and foster parenting.

**vii. Vocational Educational Training (not to exceed 12 months with respect to any individual) means organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training including a baccalaureate or advanced degree.**

- This activity includes supervised homework time and unsupervised homework time; the latter not to exceed one hour of for each hour of class time counted.
- Vocational education is provided by education or training organizations, such as vocational-technical schools, community colleges, universities and other post-secondary institutions and proprietary schools, etc
- This component may include remedial education and/or English as a Second Language (ESL).

**viii. Providing Child Care Services to an Individual who is Participating in a Community Service program means providing child care to enable another TANF recipient to participate in a community service program.**

- This activity does not include child care provided to enable a TANF recipient to participate in any other of the allowable work activities. It is exclusive to community service only.
- This work activity also meets the definition for unsubsidized employment, and work experience, if they also fit that definition.

## **B. Non-Core Activities**

**i. Job Skills Training directly related to employment means training or education for job skills required by an employer to provide an individual with the ability to obtain employment or to advance or adapt to the changing demands of the workplace.**

- This component includes both customized and general training to prepare individuals for employment, including literacy and language instruction, but not barrier removal activities, such as substance abuse counseling and treatment.
- Post secondary education that leads to a bachelor's or advanced degree count under this definition, however, as long as it is directly related to employment. For example, if an employer requires a degree for job retention, this would count.

- This activity includes supervised group home homework and study time and unsupervised homework time; the latter not to exceed one hour of for each hour of class time counted.
  
- ***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 means education related to a specific occupation, job, or job offer.***
  
- This work activity includes adult basic education, English as a Second Language (if needed for employment), education leading to a GED or high school equivalency diploma (if a prerequisite for employment), and literacy training.
- Participants are required to verify they are maintaining at least a “C” average, attend at least 80% of classes, and not repeat classes.
- This activity does not include unsupervised homework, however, it includes supervised group homework and/or study time
  
- ***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 means regular attendance, in accordance with the requirements of the secondary school or course of study, at a 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.***
  
- This activity includes courses leading to a High School Diploma or General Education Diploma, but, it does not include other related educational activities, such as adult basic education or language instruction if they are not part of a High School Diploma or General Education.
- This activity includes supervised group home homework and study time and unsupervised homework time; the latter not to exceed one hour of for each hour of class time counted.

## **2. Transitional Services for Families no Longer Receiving TANF**

- A. **Medical Assistance** – Upon termination of TANF, families remain eligible for medical assistance for 8 months. This is done through collaboration with the Virgin Islands Department of Health.

- B. **Childcare** – Families that are no longer on TANF remain eligible for childcare based upon the Childcare Block Grant's income eligibility guidelines.
- C. **Supplemental Nutritional Assistance Program (SNAP)** – Families no longer on TANF will continue to receive SNAP based on eligibility.
- D. **Transitional Income Disregard** — On full employment of the work eligible head of household, the earned income of the head of household is disregarded for a three month period while the family unit continues to receive full cash assistance and other benefits such as transportation stipend and work required items stipend (WRIS). This applies to all types of full time employment.
- E. **Financial (Cash) Assistance** – Families no longer on TANF can continue to receive transitional financial assistance if they are part of the 20% hardship exemption policy.

### 3. Reduction of Financial Assistance Due to Refusal to Work

Pursuant to 45 CFR §261.14; the VI TANF Work Verification Plan and State Plan the Territory removes from the TANF grant accordingly, the need of any work-eligible individual who fails to comply with the work requirement:

- The need of the head-of-household is removed from the family grant (essentially reducing the grant by \$100.00), the head-of-household receives a 10% reduction in SNAP benefits, and loses categorical eligibility for the Medical Assistance, childcare, and transportation benefits.
- On recognition of non-compliance, the head-of-household is notified that further failure to comply with work requirements will result in a sanction and if non-compliance persists the entire family case will be closed after 90 days.
- **After 30 days of non-compliance**, the Head-of-household is notified that failure to comply with the work requirement will result in closure of the entire family case in 60 days.
- **After 60 days of non-compliance**, the Head-of-household is notified that failure to comply with the work requirement will result in closure of the entire family case in 30 days
- **After 90 days of non-compliance**, the Head-of-household is notified that the entire family case is closed for failure to comply with the work requirement.

**4. The Average Number of Payments for Childcare Services Made by the United States Virgin Islands through Disregards**

**Table 1 Licensed/Regulated Childcare Facilities**

Licensed/Regulated In-Home	Licensed/Regulated Family	Licensed/Regulated Group Home	Licensed/Regulated Center-Based
<b>0</b>	<b>0</b>	<b>44</b>	<b>63</b>

**Table 2 Legally Operated Childcare Facilities**

Legally Operating In-Home		Legally Operating Family		Legally Operating Group Home		Legally Operating Center-Based
Relative	Non-Relative	Relative	Non-Relative	Relative	Non-Relative	
<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

*(Legally Operating means no license category available in State or locality)*

Total JOBS children **109**

**5. Strategies and Procedures to Ensure Domestic Violence Victims Receive Alternative Services Under Family Violence Option**

Under section 402(a)(7), the United States Virgin Islands has adopted the Family Violence Option (FVO) and in accordance with subpart B of part 260 has implemented the following:

- A. **Screening** – The Territory has developed a screening instrument used as part of the initial and on-going assessment protocol for identifying family violence victims.
- B. **Individualized Service Strategy** – Family violence victims receive an Individual Responsibility Plan and are referred to the Department’s Office of Intake and Emergency Services for individualized services
- C. **Alternative Services** – Under an inter-agency agreement, and in collaboration with the Department of Human Services, the Family Resource

Center and the Women's Coalition ensure the participant receives legal services, advocacy, medical services, educational services, vocational training, and support services. All services are guided by the Individual Responsibility Plan.

- D. **Re-evaluation** – The Individual Responsibility Plan and commensurate alternative services are issued for no longer than 6 months in duration and are subject to re-evaluation at the end of that period.
- E. **Confidentiality** – Rigorous confidentiality guidelines consistent with federal confidentiality regulations are established between both agencies.
- F. **Hardship Benefits** — A case that has reached the federal five year limit but where the work eligible head of household is in a domestic violence treatment program, TANF benefits continue to be made available to the family unit under the 20% hardship quota. Hardship status is re-evaluated every six months.

**6. Non-Recurrent Short-term Benefits**

(This service is provided by another division in the Department of Human Services.)

**(i) Emergency Welfare Assistance Program - N/A**

**TANF Diversion – N/A**

**Eligibility – N/A**

**Policy – N/A**

**7. Procedures for Resolving Displacement Complaints Pursuant to 407(f)(3) –**

This Section does not apply to the United States Virgin Islands.

**8. Programs and Activities Directed to the 3<sup>rd</sup> and 4<sup>th</sup> Statutory Purpose of TANF**

- a. **Prevent and Reduce Incidents of Out-of-Wedlock Births** –The Territory provided education that promoted the advantages of a cohesive two family structure through public service announcements, sessions in public schools.

Pamphlets and brochures that educate and promote marriage and family were disseminated to the public from TANF office outlets, at conferences and other forums.

**b. Encourage the Formation and Maintenance of Two-parent Families**

The Territory does not have a two-parent family program. However, the territory encourages two-parent families through counseling and PSA announcements. The Territory also encourages two-parent families through its inter-agency relationships with other government departments such as the Virgin Islands Department of Justice, Division of Paternity and Child Support. All TANF recipients are required to establish paternity and take legal action to collect child support from the non-custodial parent as part of the childcare support eligibility protocol.

The Territory convened a Family Month of events during the month of October. Events included:

- i. An approximately three-mile or more family walkathon (one on each island), a family fun day with family centered culturally sensitive activities and presentations. Colorful T-shirts were used to promote the events.
- ii. Conferences, (one in each district), open to the public and mandatory for TANF participants and with a collaboration of organizations in the public, and not-for-profit areas. Presentations focused on a range of topics that impact the nation's families and in particular, Virgin Islands families. Topics included anger management, awareness and impact of illegal drug use and its impact on families; importance of healthy nutrition; building positive relationships within the family; coping with domestic violence.
- iii. *Health Screenings* for seniors at two major senior citizens homes: Queen Louise and Lucinda Millin
- iv. *Know Your Family History*:— In a collaboration between DHS and pharmacies in the territory, posters and forms were made available to the public. The project facilitated the recording and sharing of health information within families. The service will be a permanent feature for VI families.
- v. Training in the most updated techniques in diabetic care was provided for health professionals. This was a collaboration between DHS & DOH.
- vi. Promotion of positive family activities and values through public service announcements.
- vii. Collaboration with Coral World for October month *\$1.00 Family Special* entrance fee to provide healthy family activities for families.

- viii. In collaboration with not-for-profit Word of Faith Ministries, **Family Fun Rides** were convened at TuTu Park Mall Parking lot over a two-week period to encourage healthy and fun family activities.

## 9. **An Estimate of the Total Number Who Participated in Subsidized Employment**

In October of 2010, the Territory embarked on a subsidized employment program under TANF (in accordance with (§261.30(b) and (c)). The initial phase of subsidized employment was funded through an ARRA Community Block Grant for the purpose. The purpose was two-fold: to provide employment for TANF recipients while simultaneously, helping to build the capacity of not-for-profit organizations.

The second phase was launched in June 2010 and saw ARRA reimbursement funds being used to further the subsidized employment program with placements in the Department of Human Services.

An estimated 85 persons (16% of caseload) were placed in subsidized employment over 2010.

Attachment B

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

**State Virgin Islands**

**Fiscal Year 2010**

**Date Submitted: December 16, 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: Temporary Assistance for Needy Families

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

Major services and activities were same as the Federal/TANF Program. They included assistance, work activities, education, administration and technology systems.

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

To provide services in order to assist participants become self-sufficient.

4. Program Type. (Check one)

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):

Not applicable

6. Total State Expenditures for the Program for the Fiscal Year: \$1,305,792.00

7. Total State MOE Expenditures under the Program for the Fiscal Year:  
\$1,305,792.00

8. Total Number of Families Served under the Program with MOE Funds: 519

This last figure represents (check one):

X The average monthly total for the fiscal year.

\_\_\_\_\_ The total served over the fiscal year.

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

Same as federal/TANF Program as referenced in the Virgin Islands TANF State Plan, Page 6, in the section called, Assessment, Sub-Section B.

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

Yes X No

11. Total Program Expenditures in FY 1995: \_\_\_\_\_

(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:  February 15, 2011  
Date  
NAME: Lennox Zamore  
TITLE: Administrator