



## AGENDA ITEM REQUEST FORM

### Communication to Board of County Commissioners

**To:** Chair Linda Isenhart, Commissioner Web Sill and Commissioner Sandy Hollingsworth

**From:** Laura Solomon  
Name

Human Services Director  
Title

**Today's Date:** May 3, 2022

**BoCC Meeting Date:** May 17, 2022

**Does this item require a PUBLIC HEARING?** No

**Item:** [The Gilpin County Colorado Works Updated Plan\\_](#)

**Request or Issue:** The plan has been reviewed by the State and is now required to be reviewed by the Gilpin County Board of Commissioners and signed by the Chair person or their designee.

**Recommended Action / Next Step:** [Approval of the Gilpin County Colorado Works Plan](#)

**Finance/HR Staff Review:** [N/A, no impact.](#)

**Grant Apps:** [N/A](#)

**Associated Agencies:** The Colorado Works Plan templates are created by the State of Colorado's Economic Securities Division. There is language that is specific to how county programs are run, or choices that the county must decide.

**Background Information:** Each County is required to submit an updated Colorado Works Plan when requested. Our last plan was created for state fiscal year (FY) 2020 through 2021. This plan will be for FY 2022-2023. The state provided new templates for counties to complete this year. While we can add some information or choice, the templates are specific in covering all the federal and state requirements for Colorado Works. We turned in the unsigned Draft that was approved by the state and now are looking for approval from our BOCC.

**Amount of agenda time needed:** 5 minutes

**Is this item time sensitive:** The signed policy packet is due to the State June 30, 2022. The state has approved the policies as written. We are asking for approval by our BOCC.

**Contact for Follow Up:** Laura Solomon @ [lsolomon@gilpincounty.org](mailto:lsolomon@gilpincounty.org)



**COLORADO**  
Office of Economic Security  
Division of Employment & Benefits

# COLORADO WORKS GUIDE



2022-2023

Gilpin County Plan



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POLICY	CATEGORY	DESCRIPTION	COLORADO REVISED STATUTES	COLORADO CODE OF REGULATIONS
<b>DIVERSION (State and County)</b>	Required if Practiced	Counties may issue lump-sum payments to eligible families to divert their need for ongoing cash assistance. Counties must identify in this policy which types of diversion payments they will provide, the criteria for determining the suitability of diversion instead of ongoing cash assistance, the income eligibility criteria for county diversion payments, the maximum dollar threshold for a diversion payment, and the period of ineligibility for ongoing cash assistance if diversion is issued.	26-2-706.6	3.606.8
<b>HARDSHIP (60-Month Extension)</b>	Required	Adults are limited to 60 lifetime months of cash assistance through the TANF program. Counties may extend up to 20% of their total caseload beyond the 60-Month limit for established criteria as outlined in this policy.	26-2-716(5)	3.606.6
<b>WORKFORCE REQUIREMENTS &amp; EMPLOYMENT OUTCOMES</b>	Required	This policy addresses several aspects of programming for work-eligible individuals, to include describing job readiness and exemption provisions, good cause for non-participation, and post-TANF employment programming or services. Counties must identify what federal and non-federal work activities they will offer to families in their county.	26-2-703(21); 26-2-711(1)(b) and (5)(a)(b); 26-2-714(5.5)	3.606.8; 3.608.1; 3.608.2; 3.608.3; 3.608.4
<b>OTHER ASSISTANCE/</b>	Required	This policy identifies what type of other assistance/supportive services the county may provide to	26-2-706.6;	3.606.8; 3.609.961



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Colorado Works Guide

<b>SUPPORTIVE SERVICES</b>		families, the criteria for receiving, and dollar limits on such payments. Non-monetary assistance, such as referrals to other programming or services, should be identified only if a contract or MOU for such services currently in place (e.g. disability navigation) and that required by the Family Violence Option. General referrals to services available to the community at large should not be included.	26-2-709	
<b>DOMESTIC VIOLENCE</b>	Required	This policy must identify program provisions related to domestic violence, including assessment, and the utilization of the three Family Violence Option waivers.	26-2-716	3.604.2
<b>FRAUD AND QUALITY ASSURANCE</b>	Required	Counties must identify local controls for monitoring and rectifying both internal and external fraud. Quality Assurance provisions should identify the county procedure for sampling and reviewing case files in alignment with the Work Verification Plan. Additional county procedures or protocols for quality assurance may be identified.	26-1-112; 26-1-118; 26-2-703(17.5)	3.609 CDHS Fraud Prevention Manual
<b>NEPOTISM   CONFLICT OF INTEREST</b>	Required	This policy must identify county requirements for processing and maintaining employee and/or employee-relation cases, or any case where conflict of interest is present.		3.603.1
<b>COUNTY EMERGENCY DISASTER PROGRAM</b>	Required if Practiced	Counties may create an optional county diversion program that, in the event of a declared emergency in the local area, may serve eligible families through their Colorado Works Program, provided criteria is met. A desk aid is provided.	26-2-137; 26-2-703; 26-2-706.6	3.606.8; 3.609.961
<b>SUBSTANCE ABUSE AND ALCOHOL ABUSE SCREENING &amp; TREATMENT</b>	Required if Practiced ( <i>please contact state department for guidance in this area</i> )	Counties may create an optional substance abuse screening & treatment policy outlining their procedure for identifying and pursuing treatment options that support participant well-being.	26-2-703	3.606.8; 3.608.1; 3.608.2; 3.608.3



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**RECOMMENDED COMPONENTS TO MINIMIZE RISK**

Y/N

Does this policy package clearly represent the county's current business practice?

Does this policy package clearly represent the county's current philosophy?

Does this policy package use flexibility allowed by state and federal regulations to best serve the needs of your customers and their families?

Are all required policies included?

Does each policy (including modifications/amendments) include effective dates and signatures?

Does each policy outline the background/philosophy, policy and operational procedures (where applicable) citing current federal and state regulations as warranted?

Has a process been established to ensure regular review and updates of each policy?

Was this policy package thoroughly vetted, analyzed, and evaluated by county program staff and partners prior to obtaining approval from your Board of County Commissioners (BOCC) or other governing board?

Do these policies incorporate promising practices in the human services arena? (e.g., Are successful outcomes likely? Is an effective county policy training plan in place?)



*Gilpin County*

*Department of Human Services*

**POLICY**

<p>POLICY TITLE</p> <p><b>Workforce Requirements &amp; Employment Outcomes</b></p>	<p>REFERENCE</p> <p><b>C.R.S. 26-2-703(21); 26-2-711(1)(b) and (5)(a)(b); 26-2-714(5.5) CDHS Volume 3.606.8; 3.608.1; 3.608.2; 3.608.3; 3.608.4</b></p>
<p>POLICY NO.</p> <p><b>100 – CWP</b></p>	<p>EFFECTIVE DATE</p> <p><b>April 1, 2022</b></p>
<p>DIVISION DIRECTOR APPROVAL</p>	<p>BOARD OF COUNTY COMMISSIONERS ADOPTION DATE</p>

## **BACKGROUND / PHILOSOPHY**

The goal of the Gilpin County Colorado Works Program is to promote the long-term economic well-being of our community, through preparation for and attachment to employment for those who are able to work. Gilpin County prioritizes attachment to jobs that offer a family sustaining wage and/or the opportunity for career advancement within our county. We have designed our Colorado Works program to engage individual participants with the services, opportunities, resources and tools they need to successfully find and maintain employment, and advance in their career. Gilpin County facilitates robust employment gains by partnering with local businesses, educational institutions, and other service providers in our area, and advocating for our participants as a vital part of the Gilpin County talent pool. For those who are not readily able to work, Gilpin County Colorado Works Program offers supports and services intended to increase employability and promote family safety and stability.

## **PURPOSE**

The purpose of this policy is to identify the mechanisms by which Gilpin County ensures participants are provided with the opportunity to engage in the programs and services they need to successfully find and maintain employment, and advance in their careers. This policy explains how participants are assessed and supported on their progression to



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economic well-being through Colorado Works, and what criteria the county has established



for exemptions from or accommodations to standard program elements, including locally defined services offered through the Colorado Works program in Gilpin County.

## **POLICY**

Gilpin County takes an individualized approach to service delivery, beginning with assessment and throughout our program delivery. In the development of an individualized plan, we emphasize family-driven goal-setting structured around attainable objectives. Because our ultimate goal is to assist participants to obtain and keep the best possible job, we structure our program with this aim in mind. Gilpin County uses the full array of work activities offered under the Colorado Works program to support participants in their progress toward economic well-being. We work with customers to combine work activities to the full extent allowable under the Colorado Works program. We recognize that some participants may be unable to successfully engage in employment services at times, particularly initially. We created county-defined activities designed to support the full spectrum of participants in our program. These activities, and the criteria for determining suitability for them, are included in this policy.

Adults and youth over 16 are determined at application to be either eligible or ineligible for assistance. Cases that are without eligible adults are considered to be “child only” and are not required to participate in employment activities. Adults who are considered work-eligible are provided with individualized services and supports to promote their family’s economic well-being. Gilpin County case managers assess work-eligible participants to determine which services and supports available in the program are the best fit for the participant, and working together, an individualized plan is developed.

### Assessment

Gilpin County conducts assessments for all work-eligible members of the household within 30 days of application. These assessments consider education, employment, household circumstances impacting economic well-being, and other relevant factors. Assessment tools are used to support the assessment interactions as needed, and documentation is retained and case noted. Based upon the assessment, an individualized plan is developed.

### Job Readiness

Gilpin County recognizes that even those adults who have been identified as “work-eligible” may need to pursue strategies other than employment in order to attain economic well-being. Similarly, some families may be experiencing a crisis that needs to be dealt with before employment can be pursued. Examples may include families who are living in a shelter, those newly involved in child welfare, or those addressing other immediate safety issues.

Gilpin County may determine which individuals in these circumstances are not ready to focus on employment. This is determined through an assessment and addressed through the individualized plan. Domestic Violence issues are addressed in the Domestic Violence policy and substance abuse issues are addressed in the Substance Abuse policy. Gilpin County considers the presence of these circumstances as not ready to focus on employment:



- Resolving medical or mental health issues
- Actively seeking SSI/SSDI for the first time (no appeals)
- Pregnancy past the 7<sup>th</sup> month
- Primary care for an infant younger than 12-weeks
- Primary care for a disabled family member
- Child welfare involvement requiring immediate attention
- No available child care (see below)
- Other family emergency on case-by-case basis

Gilpin County does not require participants to document or verify their involvement in activities when not focused on employment, and will work closely with participants to schedule regular check-ins to document progress.

Job readiness in Gilpin County is when an individual is able to participate in and benefit from a variety of employment and training services or activities to assist participants in identifying their goals.

Gilpin County supports these individuals by applying a variety of work-centered support mechanisms, including but not limited to:

- Culture and messaging that is family- and employment-focused
- Assessing individual and family circumstances on a continuing basis through coaching interactions, in addition to using appropriate assessment tools based on unique customer situations
- Effective motivational interviewing techniques
- Development of individualized plans centered on customer needs and goal setting
- Ongoing evaluation of Gilpin County business practices
- Continued skill development of Gilpin County technicians and coaches to assist participants in identifying their goals for program participation.

#### *Individualized Plan*

Utilizing the assessment results, Gilpin County will collaborate with all work-eligible participants to develop an individualized plan. Plan will be tailored to each participant's strengths, desires, and goals, in addition to proactively addressing challenges that may arise in the pursuit of economic security.

Case managers must collaborate with work-eligible participants to develop an individualized plan within 30 calendar days of the completion of the assessment. Gilpin County uses the "My Roadmap" individualized plan in CBMS. Because the duties and responsibilities of both parties must be clearly outlined in the plan, the plans must be completed in their entirety, and agreed upon by both the participant and the county worker. Plans may draw upon the full array of work activity opportunities, and/or include Gilpin county-defined hold activities (see below), supportive services, and referrals, as warranted. Individual plans will be revisited at least every three (3) months to ensure objectives are still relevant and support individuals in meeting their goals. Referrals will be made as needed to aid in progression, as the plan also guides necessary follow up with



others providing support in the plan..



**THIS SECTION OFFERS COUNTIES  
TWO (2) FUNDING OPTIONS  
UNDER THIS CATEGORY**

*Segregated Funds – “Non-TANF County MOE”*

Option  
#1

Gilpin County does not use segregated funding for cash payments, and therefore does not code participants as “NR - not job ready” in CBMS. Instead, county holds are used for participants who are exempted from work requirements.

Option  
#2

Gilpin County may utilize Non-TANF MOE funding under the following circumstances:

- Individuals are involved in the process of applying for Social Security disability benefits
- Individuals are involved with domestic violence issues
- Individuals have a current behavioral or physical health issue, documented by a medical or mental health professional
- Individuals who have been assessed with having other significant challenges to working that may include, but are not limited to:
  - Limited English Speaking
  - Children Circumstances
  - Essential Skills Lacking
  - Substance Abuse Problems
  - Homelessness

*Child Care Availability*

Gilpin County defines available child care as child care that maintains the health and safety of the child while encouraging growth and development.

Child care may be provided either by a licensed or exempt child care provider. An unlicensed provider is found unsuitable by Gilpin County if an individual residing in the home in which care is being provided, or who has access to the home, has a record of child



abuse or neglect, violent behavior, substance abuse or any activity that may endanger the health or welfare of the child.

Gilpin County uses the “child care unavailable” activity code in CBMS when participants who are caring for a child(ren) have demonstrated inability to obtain available child care. These participants may not be sanctioned.

In order to be considered “available,” care must be:

- Affordable. Affordable child care is defined as child care for which **the** out-of-pocket cost to the parent does not exceed 20% of the family’s gross earned income.
- Within a Reasonable Distance. Child care within a reasonable distance is defined as not exceeding a 60-minute round-trip commute (utilizing the most efficient transportation available to the participant) between the child’s home and the child care setting or between the parent’s place of employment and the child care setting.
- Appropriate. Providers offering a safe and healthy environment for all children and specialized care for children with medical conditions or special needs.

Child care unavailability does not need to be documented in any prescribed way. Gilpin County exercises the Prudent Person Principle in instances where documentation is unavailable or when obtaining such would create undue hardship to the family.

#### Notification

Adult participants who are exempted due to any of the above (or any other criteria) must be notified that even though they may be exempted from work-related service requirements, they are accumulating TANF months that count toward their 60-month lifetime limit.

#### Employment-focused Services

Gilpin County places a high value on the goal of economic well-being of our community, through preparation for and attachment to employment. Gilpin County focuses on attachment to all jobs, but prioritizes those offering a family-sustaining wage, as defined locally by the Colorado Department of Labor and Employment, and the opportunity for career advancement within our county. Participants who are determined to be job ready through the assessment process are individually engaged to ensure the most appropriate services and supports are provided to meet their employment goal.

Job ready participants who do not have educational or skills gaps that need to be addressed may benefit from one or more of the following activities:

- Employment
- Subsidized Employment
- Work Experience/Internship
- Community Service
- Job Search
- On-the-job training



These services are always paired with individualized case management, coaching, supportive services, and referrals as needed. Participants in these activities will have child care provided through the Colorado Works program or Colorado Child Care Assistance program, as available. Participants in these activities will be asked to support their progress through provision of state-required documentation, as specified in the state's Work Verification Plan.

Gilpin County recognizes that for some participants, lack of formal or sufficient education may preclude them from successfully attaching to or sustaining employment. Participants who are lacking necessary educational qualifications and/or skills are individually engaged to ensure the most appropriate services and supports are provided to meet his/her needs.

#### Education-focused Services

Gilpin County makes a concerted effort to provide participants with robust opportunities to enhance their education, often through referral to community-based and partner organizations that offer adult and basic skills classes, and GED preparation and testing. Gilpin County also partners with the local community college to identify credentialing opportunities associated with career pathways in our local community, and serves as a connector to these opportunities for Colorado Works participants. Regardless of the referral made, Gilpin County works individually with participants to determine the best combination of offerings to quickly advance their employment goal and maximize their time in the program.

Participants who have identified educational or skills gaps may participate in any of the following activities:

- Basic Education
- Vocational Education
- English as a Second Language
- Job Skills Training
- Work Study
- High School
- GED Prep

These services are always paired with individualized coaching, supportive services, and referrals as needed. Participants in these activities will have child care provided through the Colorado Works program, or the Colorado Child Care Assistance Program. Participants in these activities will be asked to support their progress through provision of state-required documentation.



### Holidays and Absences

To help prepare our participants for employment outside of the Colorado Works program both employment and educational activities are treated like work.

Allowable excused absences may include, but are not limited to the following reasons:

- Temporary Child Care disruption
- Funeral Leave
- Legal Obligation
- Site closed due to weather or for child if attending school
- Medical appointment for self or child
- Substance abuse treatment/counseling appointment/probation appointment.
- Hospitalization of self, child, or other immediate family member

Gilpin County may approve additional excused absences, with respect to cultural and religious reasons, on an individual or case-by-case basis. The total number of excused absences will be limited to 80 hours per year and no more than 16 hours per month.

10 holidays are recognized by the Colorado Works Program:

- New Year's Day
- Veterans Day
- Memorial Day
- Independence Day
- Labor Day
- President's Day
- Thanksgiving Day
- Friday following Thanksgiving Day
- Christmas Eve Day
- Christmas Day

### Good Cause: Work Requirements

Gilpin County makes every reasonable effort to ensure individualized plans are appropriate, achievable, and the most likely strategy to support a participant's long-term economic well-being goals.

Gilpin County recognizes that there may be instances where a participant is unable to comply with the plan's terms. Good cause in Gilpin County is defined as follows: unforeseen, unusual or unavoidable circumstances that would prevent most people from being able to engage in their plan as expected. Gilpin County does not require documentation or verification for good cause, but does require that notice be provided within 48 hours of disengagement in order to avoid sanction. Notification should explain the reason for disengagement and should demonstrate good cause.

In general, the Prudent Person Principle is used to determine good cause. At minimum, good cause for the county not pursuing a sanction will include:



- Breakdown in child care arrangements or a lack of available and appropriate child care
- Remotely located without transportation and unable to relocate or a breakdown in transportation arrangements with no feasible alternative
- School obligations that frequently necessitate a parent's or specified caretaker's attendance
- Loss of housing, or a housing crisis that might result in homelessness or eviction, which prevents the individual from participating in the requirements of their Roadmap
- Verifiable medical emergencies or crisis involving members of the family
- Short term temporary relapse in a participant's certified drug/alcohol treatment program
- Legal proceedings for the participant or a dependent minor
- Employment Issues when layoffs occur, wages are below applicable federal and state minimum wage standards, working conditions present a risk to health or safety, or Workers' Compensation protection does not exist
- Participant's incarceration of less than thirty days
- Jury duty
- Death of a family member or authorized representative
- Other situations, as determined by the Gilpin County

In the event that a participant does not provide good cause rationale, a participant may be sanctioned or a case closed for demonstrable evidence.

#### *Job Retention and Post-Employment Programming*

Transitional support may be provided to individuals after obtaining employment to foster job retention. The Post-Employment program will support and encourage a participant to remain employed through time limited job retention services for individuals that become ineligible for TANF assistance due an increase in earned income. Services will be offered to individuals who were and remain a Gilpin County resident prior to becoming ineligible for TANF benefits, and who have demonstrated a need for ongoing support.

Employment incentives will be issued through the county diversion process for individuals who are still employed 60-days and 4-months after exit due to excess earned income (see Diversion Policy). Program participants will receive career coaching as needed (up to monthly) to support workplace success, and intervention and prevention services such as employment counseling and financial and employment retention planning, will also be provided.

Gilpin County will pay the parental fee for CCCAP child care for post-employment participants, up to 6 months after exiting Colorado Works.

#### *Outcomes*

Gilpin County uses work engagement strategies to ensure meaningful participant outcomes, while maintaining federal program requirements. Gilpin County has identified the following outcomes to be meaningful in promoting the long-term economic well-being of our community, through preparation for and attachment to employment for those who are able to work; Gilpin County tracks this data on a quarterly basis:



- Job Retention
- Job Promotion
- Wage and Benefits
- Wage Increases
- Progress towards established goals
- Goal Achievement

Signed by:

\_\_\_\_\_  
CHAIR, GILPIN COUNTY BOARD OF COUNTY COMMISSIONERS

\_\_\_\_\_  
DATE



*Gilpin County*

*Department of Human Services*

**POLICY**

POLICY TITLE <b>Hardship Extension (60-Month)</b>	REFERENCE <b>C.R.S. 26-2-716(5)          CDHS Volume 3.606.6</b>
POLICY NO. <b>200 - CWP</b>	EFFECTIVE DATE <b>April 1, 2022</b>
PROGRAM MANAGER APPROVAL	DIVISION DIRECTOR APPROVAL

**BACKGROUND**

The Gilpin County Colorado Works program is designed to support low-income families in their progression toward economic well-being. Gilpin County recognizes that this progress takes more time for some families than for others, and therefore, has created this policy to ensure extensions to program benefits are provided where feasible and appropriate and as feasible, within federal and state program guidelines. An assistance unit containing an individual who has received Federal TANF assistance in Colorado or another state(s) as an adult for sixty (60) cumulative months shall not be eligible for Federal TANF assistance unless granted an extension by the county department due to hardship or domestic violence. Assistance units that contain excluded members shall not be eligible for consideration of an extension.

**PURPOSE**

The purpose of this policy is to establish the criteria for a hardship extension (see “Domestic Violence/Family Violence Option Policy”).

**POLICY**

All participants, with the exception of assistance units containing excluded members, may request an extension when a hardship exists. A participant’s request for an extension can be made in person, by phone, or in writing. Extensions may be granted for up to six months; additional extensions may be granted if circumstances warrant the extension and it is requested prior to the end of the current extension. If a participant fails to request an extension on a timely basis, an extension may be granted at the discretion of Gilpin County.



### Eligibility

Gilpin County will consider a hardship extension if one or more of the following criteria exist:

- Inadequate, or unavailable:
  - Childcare
  - Housing
  - Transportation
  - Employment opportunities, including but not limited to:
    - When layoffs occur
    - Wages are below applicable federal and state minimum wage standards
    - Working conditions present a risk to health or safety
    - Workers' Compensation protection does not exist
    - Lack of jobs due to high unemployment rates and poor labor market in region
    - Available jobs do not align with skills or career profiles, on a case-by-case basis
- Disability of the specified caretaker or child, verified by a certified professional;
- Involvement in the legal system by a member of the assistant unit;
- Family instability, which may include but is not limited to, a specified caretaker with the inability to maintain stable employment or care for the children in their own home or in the home of a relative based on the assessment;
- Domestic Violence issues as determined by Gilpin County

Gilpin County will notify all participants who are approaching the 60-month time limit on Colorado Works assistance, starting at 55 months. Gilpin County will make all reasonable efforts to contact the participants by phone or in person to explain the extension process to accept a request for an extension.

Gilpin County will make a determination to grant or deny the extension within 30 days of receiving the customer's request for extension. The department will provide written notification to the participant. If the extension is denied, the notice will include the reason for the denial and explain the appeal process.

### Additional Criteria

Gilpin County must work with participants to develop an individualized plan that will include participation activities along with county and community supports to address the causes of the extension. Additionally, the plan will include sanction procedures for failing to comply and appeal rights.

Good cause for non-compliance with the conditions of the hardship extension plan are the same as any other individualized plan developed and agreed upon, and include, but are not limited to:

- Total disability of the participant or the participant is needed in the home to provide full-time care for their disabled child. The disability of the participant or the child must be verified and documented by a medical statement
- Victims of domestic violence who risk endangering themselves or their children by participating in a Colorado Works activity



- Death of an immediate family member
- Jury duty
- Other documented household circumstances determined by Gilpin County

County Provisions related to Native Americans/Alaskans

Any month of receipt of assistance by an adult while living in Indian Country, or a Native Alaskan village where at least 50% of the adults were not employed will not be counted toward the 60-month lifetime limit. Up to 20% of the county caseload may be granted an extension beyond the 60-month lifetime limit due to hardship or domestic violence.

Signed by:

\_\_\_\_\_  
CHAIR, GILPIN COUNTY BOARD OF COUNTY COMMISSIONERS

\_\_\_\_\_  
DATE



*Gilpin County*

*Department of Human Services*

**POLICY**

POLICY TITLE <b>Other Assistance &amp; Supportive Services</b>	REFERENCE <b>C.R.S. 26-2-706.6; 26-2-709          CDHS Volume 3.606.8; 3.609.961</b>
POLICY NO. <b>300 – CWP</b>	EFFECTIVE DATE <b>April 1, 2022</b>
DIVISION DIRECTOR APPROVAL	BOARD OF COUNTY COMMISSIONERS ADOPTION DATE

## **BACKGROUND / PHILOSOPHY**

Gilpin County, along with our workforce development partners, economic development community, community-based organizations, education and training providers, and other stakeholders plays a key role in supporting economic well-being for low-income individuals and families in our community. Gilpin County recognizes that employment is a key component of family stabilization and economic stability, and acknowledges that education and other work and family supports are crucial for attachment to employment that offers family-sustaining wages, and career advancement opportunities.

Because of this, Gilpin County provides broad assistance to eligible Colorado Works participants to help them establish economic security, enhance their quality of life, promote employment goals.

## **PURPOSE**

The purpose of this policy is to outline supports and services available through Gilpin County Human Services. Access to these services is contingent upon individual and family needs and Colorado Works program engagement, within the limits of county resources.



## POLICY

### Income Eligibility

To receive other assistance or supportive services, participants must be eligible for basic cash assistance and meet all criteria for the Colorado Works program.

### Additional Eligibility

Participants must meet criteria for non-financial eligibility for the Colorado Works program, with the exception of non-custodial parents, who are exempted from dependent-child requirements.

All case types are eligible for the supports defined by this policy, as family need and county resources allow. All additional supports and services must be identified in the individualized plan and case documentation must be provided to substantiate need.

Gilpin County takes an individualized, strengths-based approach when assessing families for supports and services that they may need in addition to their cash grant, and beyond standard program services. Gilpin County staff has the responsibility of linking participants to resources that will help support their long-term economic security, and ensuring they receive appropriate supports in a timely manner. This includes advocacy, counseling, prevention and intervention, and mediation services, when appropriate.

## CHILD ONLY CASES

Children in poverty face an elevated risk of adverse outcomes. Gilpin County conducts thorough assessments for the whole family to include child only cases which ensure all needs are identified and the appropriate levels of support are offered as feasible. Gilpin County has developed a Family Plan template for child only cases, to ensure needs and progress are documented.

### Quality Child Care

Child care assistance in the form of cash aid, a vendor payment, or low-income Child Care Assistance may be provided through the Colorado Works program to child-only households, as the need arises. Appropriate child care is defined as child care that maintains the health and safety of the child while encouraging growth and development. The child care may be provided either by a licensed or exempt child care provider. An unlicensed provider is found unsuitable by Gilpin County if an individual residing in the home, or who has access to the home, has a record of child abuse or neglect, violent behavior, substance abuse or any activity that may endanger the health or welfare of the child. Providers offering specialized care may be available for children with medical conditions of special needs.

### Education

Gilpin County promotes quality education opportunities for low-income children, including, but not limited to payments for tutoring and one-on-one developmental therapy. Gilpin County may provide paid tutoring services and assessments for learning disabilities.



## ALL FAMILIES

### Non-Custodial Parent Services

Gilpin County may provide payments for the services listed below to non-custodial parents who meet the needs standard for Colorado Works. Non-custodial parents do not need to be attached to an active Colorado Works household in order to be eligible for services, but must be cooperating with child support services. Services are available as resources allow.

### Family Stabilization

Gilpin County provides payments for a variety of family strengthening and support services including, but not limited to: life skills workshops, parenting classes, support groups, mentoring programs, health and nutrition classes, domestic violence perpetrator treatment, and mental health services.

### Enhanced Family and Employment Supports

Gilpin County may provide payments for enhanced employment preparation services, job development and other special needs services to eligible Colorado Works families in need of additional support in finding, attaching to, and retaining employment, based on a thorough needs assessment and as county resources allow. Services may include, but are not limited to, the following:

- Career Counseling and Planning;
- Job Coaching and Development
- Transitional Services
- Job Advancement
- Financial Planning and Budgeting

In addition, Gilpin County may offer paid internships on a limited basis to support attachment to the labor market. Internship opportunities are developed on an individualized basis in conjunction with the Workforce Center.

Additional or supplementary payments germane to attachment to employment may also be provided, and may include, but are not limited to, the following:



- Transportation expenses to participate in employment, training, or job preparation;
- Employment required tools and equipment and not covered by the Workforce Investment Act (WIA);
- Clothing;
- Glasses;
- Dental work, or other prosthetic devices necessary for employment and not covered under Medicaid or Vocational Rehabilitation services;
- Relocation assistance, consistent with a firm job offer;
- Personal care items and services needed for participating in work-related activities.
- Housing deposits;
- Utility deposits;
- Installation of phone service;



- Emergency assistance;
- Shelter;
- Child care; or
- Food

#### Referrals

Gilpin County provides referrals for any available supportive services to applicants and participants. Referrals include but are not limited to: homeless shelters, physical and mental health services, substance abuse counseling, domestic violence advocacy, legal services, and food banks.

#### Payment

Other assistance may not exceed \$3,000 per year in direct payments to households and there is no limit on the cash value of support provided as services or via a vendor. The County Director or the Director's designee has the discretion to override the amount of other assistance if a hardship exists. The Director, or designee, must document such hardship in CBMS.

Assistance may be provided either as a one-time assistance payment or on an on-going basis, both of which are intended to promote sustainable employment. Payments will be made to a participant's EBT card (via direct deposit) or as a direct vendor payment, depending on the nature of the approved expense.

#### Additional Cash Assistance

Gilpin County may authorize recurring payments designed to meet the basic ongoing needs of the persons in the assistance unit, as determined by a needs assessment and documented in the individualized plan.

Basic ongoing needs shall consist of, but are not limited to:

- Food;
- Clothing;
- Shelter;
- Utilities;
- Household goods and general incidental expenses;
- Personal care items;
- Transportation assistance;
- School assistance including fees for extracurricular activities; and
- Child Care assistance

Gilpin County may allow payments for a special need to a parent or specified caretaker whose child(ren) is eligible and receiving Colorado Works cash assistance.

Additional Cash Assistance may be provided in addition to the monthly BCA in order to support specified caretakers to ensure their continued ability to care for children, or support Colorado Works families with an assessed need.



Assessed Need

An assessed need is defined as any need of a family receiving Gilpin County basic cash assistance, beyond ordinary, routine living expenses. Assessed needs include but are not limited to, the items listed above in all categories other assistance and supportive services outlined in this policy. Other items may be identified on a case-by-case basis, at the discretion of Gilpin County.

**THIS SECTION OFFERS COUNTIES  
A TWO-GENERATIONAL SERVICE  
DELIVERY APPROACH**

As a means to unify the work that we do in our community, Gilpin County supports the framework around a two-generation approach by linking non-custodial parents to supports and services focused on parent-child interactions for fathers and children, as well as economic stability and mobility. We foster this whole-family method of delivering services by ensuring the assessed needs of non-custodial parents are met, enabling them to pay child support while bolstering their employment opportunities. Non-custodial parents do not have to meet household composition requirements.

In order for non-custodial parents to receive services, they must be a Colorado resident and a parent of a minor child, and must not be eligible to receive Colorado Works basic cash assistance. All the services Gilpin County offers to noncustodial parents are outlined in an individualized plan, and include, but are not limited to:

- Job Coaching
- Parenting Skills Classes
- Workforce Development
- Mediation
- County Diversion (See Diversion (State and County) Policy)

Signed by:

\_\_\_\_\_  
CHAIR, GILPIN COUNTY BOARD OF COUNTY COMMISSIONERS

\_\_\_\_\_  
DATE



*Gilpin County*

*Department of Human Services*

**POLICY**

POLICY TITLE <b>Diversion (State and County) Program</b>	REFERENCE <b>C.R.S. 26-2-706.6          CDHS Volume 3.606.8</b>
POLICY NO. <b>400- CWP</b>	EFFECTIVE DATE <b>April 1, 2022</b>
DIVISION DIRECTOR APPROVAL	BOARD OF COUNTY COMMISSIONERS ADOPTION DATE

## **BACKGROUND**

Gilpin County recognizes that families may have immediate and short-term needs for financial assistance that, if met, can quickly stabilize the household, thereby diverting a need for ongoing cash assistance (BCA). In order to meet these needs in the community

## **PURPOSE**

The purpose of this policy is to identify the eligibility and suitability criteria for diversion payments, outline programmatic components associated with such payments, and establish a period of ineligibility for receiving ongoing cash assistance, barring hardship, once diversion has been issued. Maximum dollar thresholds are also established in this policy.

A diversion payment is a needs-based, cash or cash-equivalent payment designed to meet short-term needs. Payments are designed to address specific crisis situations or episodes of need and are not designed to meet basic needs ongoing.

Families who meet eligibility criteria for basic cash assistance may be eligible for a state diversion payment. Families who otherwise meet the eligibility criteria for basic cash assistance, but are over the income guidelines (needs standard) and whose income less than \$75,000 annually may be eligible for a county diversion payment.



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Office of Economic Security

Division of Employment & Benefits

In Gilpin County, both state and county diversion are available. They are only to be made when there is no need for ongoing support or more extensive case management or services, and the payment is expected to substantially promote or maintain a family's economic



well-being through attachment to employment or another steady source of income. Prior to issuing a diversion payment, Gilpin County will determine that ongoing need is not anticipated.

## **POLICY**

Gilpin County provides cash or cash-equivalent payments not to exceed \$2,500 total per family to eligible and suitable families based upon established need, in conjunction with the determination that need is not expected to be ongoing.

### Eligibility

To receive a state diversion payment, applicants must be found eligible for basic cash assistance (BCA) by Colorado Benefits Management System (CBMS). Payments will be made through CBMS. Those who are otherwise eligible for BCA but are over the income guidelines (needs standard) and whose income is less than \$75,000 annually may be eligible for county diversion.

### Need

The applicant must demonstrate a need for a specific item or type of assistance that will promote or help maintain permanent employment, and/or economically stabilize the family, and is likely to ensure long-term economic well-being. The following criteria must be established:

- 1) The applicant (or participant) does not need long-term cash assistance as determined by an assessment;
- 2) The applicant or participant demonstrates a need for a specific item or type of assistance.

This assistance may not extend beyond four (4) months, and those who receive a diversion payment must agree to a 12-month **Period of Ineligibility** (POI) for Colorado Works (both basic cash assistance and diversion), barring hardship. The POI begins on the first day of the month following the payment month. Gilpin County will not provide diversion payments to cover recurring housing costs. Hardship for this purpose is defined as an unforeseen, unexpected and otherwise unmanageable event or crisis. The period of ineligibility may be waived if there is an identified hardship.

### Suitability

In order to be eligible for a diversion payment in Gilpin County, one adult member of the household must meet one or more of the following criteria:

- Be employed or have a verified offer of employment
- Demonstrate the ability to maintain jobs during the POI
- Have stable housing
- Have another reliable source of income

### Assessment

Gilpin County conducts in-depth assessments of family members who have been determined to be a part of the assistance unit at application. A Gilpin County worker will assess the family to develop the most appropriate plan for them to meet their long-term



economic security goals. Diversions will be issued based upon assessed need. Gilpin County workers engage in prospective budgeting and progressive wage employment with applicants to ensure needs can be met after the diversion grant is issued throughout the duration of the POI.

In addition to diversion payments, eligible participants may receive supportive services based on the assessed needs of the family.

#### Payment

A County Diversion grant may not exceed \$2,500 per twelve-month period per household; a family may not receive more than three diversion payments in a five-year time span. However, the County Director or designee has the discretion to override the number and amount of county diversions if an extreme hardship exists. A diversion payment may not be made in the same month that basic cash assistance is received.

Payments will be issued on an **Electronic Benefits Transfer (EBT)** card via direct deposit, or paid directly to vendors.

#### Allowable Use of Funds

Diversion assistance may be used for, but is not limited to, the following types of short-term assistance:

- Work-related expenses such as uniforms, dues, or supplies
- Transportation costs including car repair, car insurance, etc.
- Housing
- Training and/or education
- Participation in the Post-Employment Program
- Amelioration of any other identified barrier to employment or economic well-being

**THIS SECTION OFFERS COUNTIES  
A POST-TANF PROGRAMMING  
SERVICE DELIVERY OPTION**

#### Post-Employment Program

Transitional support may be provided to individuals after obtaining employment to foster job retention. The Post-Employment program will support and encourage a participant to remain employed through finite job retention services for individuals who become ineligible for Colorado Works assistance due an increase in earned income. Services will be offered to individuals, on a volunteer basis, who were a Gilpin County resident prior

**Gilpin County Does  
Not Offer This Service**



to becoming ineligible for TANF benefits, and who have demonstrated a need for ongoing support.

Employment incentives will be issued through the *county* diversion process for individuals who are still employed 90-days and 6-months after exit due to excess earned income. Participants in the Post-Employment Program must have an individualized plan that outlines the terms of their participation; this plan must identify the POI for the Post-Employment Program, and establish the dollar amount and frequency of incentive payments for job retention. Program participants will receive career coaching as needed (up to monthly) to support workplace success. Intervention and prevention services such as employment counseling and financial and employment retention planning will also be provided.

County will pay a portion of the parental fee for CCCAP child care for Post-Employment participants as a supportive service attached to a Diversion payment, up to 4 months after exiting Colorado Works.

Terms

Those receiving a diversion payment in \_\_\_\_\_ County develop a plan to establish the following:

- 1) Document the reason why ongoing cash assistance is not a need;
- 2) Define the expectations and the terms of diversion payment;
- 3) Specify the need(s) for and the specific type(s) of non-recurring cash payment; and
- 4) Specify the possible impacts on other assistance including Medicaid, SNAP and child care.

Payment will be based on the participant's actual estimated need.

Diversion payments will be made at the discretion of \_\_\_\_\_ County, and as budgets allow. No applicant is entitled to a diversion payment. When necessary, recoveries may be pursued.

Signed by:

**Gilpin County Does Not Offer This Service**

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CHAIR, GILPIN COUNTY BOARD OF COUNTY COMMISSIONERS

DATE



*Gilpin County*

*Department of Human Services*

*POLICY*

<p>POLICY TITLE <b>County Emergency Disaster Program</b></p>	<p>REFERENCE <b>C.R.S. 26-2-137; 26-2-703; 26-2-706.6 CDHS Volume 3.606.8; 3.609.961</b></p>
<p>POLICY NO. <b>400.1 - CWP</b></p>	<p><b>EFFECTIVE BEGIN DATE March 31, 2020</b> <b>EFFECTIVE END DATE Until Public Health Emergency Declaration is rescinded</b></p>
<p>DIVISION DIRECTOR APPROVAL</p>	<p>BOARD OF COUNTY COMMISSIONERS ADOPTION DATE <b>April 2, 2020</b></p>

**BACKGROUND**



In cases of a declared county emergency, the county may provide a variety of assistance to meet the unique needs of residents.

Due to the COVID-19 virus, Gilpin County Board of County Commissioners declared a disaster as of March 14, 2020. In cases of a declared Gilpin County disaster, the Board would like the flexibility to provide a variety of assistance to meet the unique needs of Gilpin County residents.

## **PURPOSE**

Gilpin County needs the flexibility to use Temporary Assistance for Needy Families (TANF) allocation dollars and reserves to support Gilpin County households due to the COVID-19 virus declared disaster and any other declared disasters of any kind in the future.

## **POLICY**

### **Eligibility**

- Families with annual income at or below \$75,000 will be considered for TANF funds.
- Family assistance unit contains an eligible child, per Colorado Works Program rules.
- Must present a real need for services directly relating to the declared disaster.
- Must prove lawful presence for those required to meet criteria, per Colorado Works Program rules.
- At the County Director's discretion, assistance may be provided to a family who is currently under sanction or disqualification status for Colorado Works

### **Payment**

- Eligible family assistance units will qualify for up to \$10,000, depending on available resources.
- Payment of disaster assistance funds will not affect any lifetime maximums on regular county-defined State or County Diversion funds.
- Payment type (*i.e. vendor payment, direct payment to the participant, etc.*) at the discretion of the County Director.

### **Timeframe**

- Funds are available to qualifying families immediately following the County Board of County Commissioner's declaration of a disaster and remain available until the disaster declaration is rescinded.
- In cases where latent effects of the disaster appear after the disaster declaration has been rescinded, (e.g. mental health needs), the family may petition for emergency assistance. Assistance will be granted at the County Director's discretion.
- The lifetime limits for a qualifying family assistance unit is \$10,000.



**Eligible Services**

- Assistance may include, but is not limited to the following types of assistance: purchase or lease of shelter; home renovations (within the existing footprint); transportation (including car repairs and purchase); non-covered medical expenses; work-related supplies that were lost or damaged; counseling services; non-medical mental health services.

**Process**

- In cases of emergency assistance, the assessment and Individualized Plan (IP) requirements may be modified to streamline and expedite the process.
- Receipts are not required.

*Please Note: The proposed template for an additional section in your individual county policy only pertains to county defined emergencies using existing county resources. The Governor’s declaration of an emergency and his/her direct action to suspend certain regulatory statutes as prescribed in CRS 24-32-2104 (7) allows for the ability to waive verification requirements in instances where evacuees are unable to gather required documents.*

*The Governor has declared such an emergency through Executive Order D 009 07. The Governor will need to define which statute and regulations will be suspended or changed to adequately cope with the emergency declared.*

Signed by:

\_\_\_\_\_  
CHAIR, GILPIN COUNTY BOARD OF COUNTY COMMISSIONERS

\_\_\_\_\_  
DATE



## Colorado Works Disaster Emergency Program Guidelines Gilpin County

### Application Facts:

1. The applicant must present a real need for services directly relating to the declared emergency. Need is evaluated at the discretion of the county.
2. The applicant must be a member of an assistance unit which contains at least one of the following:
  - a. At least 1 dependent child and at least 1 parent or 1 specified caretaker
  - b. An “expectant” parent
  - c. A spouse of an “expectant” parent
3. All members of the assistance unit ages 18 and older must declare that they are either:
  - a. A U.S. Citizen, *OR*
  - b. A Legal Permanent Resident of the U.S.; *AND*
  - c. Am Lawfully Present in the U.S. pursuant to federal law
4. The assistance unit’s countable gross income must not exceed the assistance unit’s need standard for Basic Cash Assistance (BCA) or the County-defined County Diversion disaster income limit (up to \$75,000 per year per assistance unit).
  - a. **Gilpin: (185% of FPL)\***
5. **All other verification is optional and the county may allow self-declaration of any additional facts or circumstances relevant to determining the assistance unit’s eligibility**
6. The assistance unit’s maximum disaster benefit cannot exceed:
  - a. The BCA grant standard, if eligible for BCA, *OR*
  - b. **\$10,000 (one-time only)**, although the county may set a lower \$ amount at its discretion based upon the availability of funds
    - i. **Gilpin: \$1,500 per family unit per year – 3 times in a lifetime**
7. The disaster program lasts from the date the county was declared a disaster area and lasts for no more than 180 calendar days. The time frame for application for assistance is at the discretion of the county director.

### Application questions:

1. Must the applicant use a state approved Colorado Works application for assistance form or PEAK to apply for disaster assistance or is there an abbreviated application they must complete?
2. Is the home address of the individual still the location where they lived prior to the disaster?



## Colorado Works Disaster Emergency Program Guidelines Gilpin County

### **Basic Cash Assistance (BCA) and State/County Diversion questions:**

1. Must the assistance unit cooperate with CSE (if applicable)?
2. Must workers run IEVS, CUBS, DOLE, and SAVE prior to approving an application?
3. If the applicant is a minor parent not living with one or both of his/her parents, must the county ensure that he/she is living in a county approved setting?
4. If the county believes the applicant's statement of one or more facts or circumstances is questionable, can the county request verification and/or deny the application?
5. If the applicant is an expectant parent with no other dependent children, is self-declaration of pregnancy acceptable?
6. Are IPV-Disqualified individuals eligible?
7. Are assistance units sanctioned at the 3<sup>rd</sup> level eligible?
8. If the assistance unit receives State or County Diversion, does the Period of Ineligibility still apply?
9. Although the application processing timeframe is 45 calendar days, does this time frame change for disaster applicants?

### **Colorado Works BCA only questions:**

1. Must the county conduct an assessment of work eligible individuals within 30 days of their application date?
2. Must work eligible individuals come in to complete the assessment or face being sanctioned or denied for demonstrable evidence?
3. Must case managers work with customers to develop an individualized plan within 30 days of completing their assessment?
4. Are counties subject to the federal work participation rates, regarding affected families?

### **CBMS Considerations:**

1. Client Clearance – State Ids
2. No client statement in “Marital Status”, only “other”
3. No client statement in “In Home”, only “other”
4. County max county diversion exceeded error message



*Gilpin County*

*Department of Human Services*

**POLICY**

POLICY TITLE <b>Domestic Violence</b>	REFERENCE <b>C.R.S. 26-2-716</b> <b>CDHS Volume 3.602; 3.604.2</b>
POLICY NO. <b>500 - CWP</b>	EFFECTIVE DATE <b>April 1, 2022</b>
DIVISION DIRECTOR APPROVAL	BOARD OF COUNTY COMMISSIONERS ADOPTION DATE

**PURPOSE**

Domestic Violence issues may prevent an individual from engaging with the standard components of the Colorado Works Program. Gilpin County will conduct a confidential screening and assessment and will provide specific information, materials, and services that support individuals involved in family (domestic) violence, as defined in Colorado Works program rule.

**POLICY**

The Gilpin County procedure allows applicants and participants to voluntarily and confidentially self-identify as survivors of family (domestic) violence, by providing multiple, safe opportunities for participants and applicants to disclose this information, and using trained staff to conduct routine assessments. Gilpin County reserves one interview room for screening and/or discussing issues related to domestic violence. This designated room has the ability to be locked. Self-disclosed information remains confidential, unless an immediate threat to safety or well-being is present.

Gilpin County provides referrals to appropriate domestic violence advocacy, counseling, and support services, to include the shelters, the Gilpin County Public Health agency law enforcement, legal aid, and Family Tree Counseling, and Case Workers. Brochures and other informational handouts regarding Domestic and Family Violence issues are distributed and available in English and Spanish to all Colorado Works applicants and participants. Other languages are available through Gilpin County's contract with AAA Translation to, material from local domestic violence and batterer's intervention service providers,



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criminal justice, victim advocate organizations, victim's compensation, and a domestic violence safety plan.



All Colorado Works applicants will be screened and identified for Domestic Violence using the state's domestic violence screening form. Screening will occur during initial application, and be addressed again at orientation and during one-on-one case management, as warranted. Applicants will be given information regarding the Address Confidentiality Program (ACP).

### Waiver

Gilpin County will offer a good cause waiver that exempt program participants who have experienced or are experiencing family violence from Colorado Works work activities, and/or increased months to the 60-month TANF time limit, and/or the requisite engagement with child support services. Gilpin County will involve the participant in the invocation of any waiver; the participant may accept or refuse any waiver offered. Good cause is granted as follows:

1. **Work activities/time clock:** If a customer is identified as a survivor of domestic violence that interferes with the safety and/or ability to participate in the Colorado Works Program, counties must offer the customer a waiver
2. **Child Support Services:** If a customer is identified as survivor of domestic violence and seeking child support services would potentially endanger or unfairly penalize the customer or the customer's family if the customer participated in the program requirement, counties must offer a child support engagement waiver to the survivor.

Individuals receiving a waiver will be referred immediately to the appropriate domestic violence advocacy and support services. Individuals will also be provided information about and, if requested, enrolled in the statewide Address Confidentiality Program (ACP). This referral and associated services will be captured in the individualized plan, and reassessed every six months. Waivers will be accompanied by documentation describing the following:

1. Past, present and ongoing impact of family violence on the individual and family
2. Individual's available resources
3. Specific program/work components being engaged in as well as those waived
4. While maintaining safety of the individual as a priority maximize opportunities to engage in education, training, work, and other activities leading to family financial security

### Training

Gilpin County staff will receive state-sponsored training in recognizing, responding to, and referring survivors and/or perpetrators of domestic violence, including associated impacts on economic independence and community resources. All staff who play a role in working with Colorado Works applicants and customers (i.e. intake, eligibility, assessment, case management, sanctioning, or workforce development) will be trained; training will be taken at least once every three years. Gilpin County supplements state trainings that are offered with internal trainings provided in collaboration with the local and/or state domestic violence programs or agencies. .



Gilpin County requires that any contractor who plays a role in working with Colorado Works applicants and customers (e.g., intake, eligibility, assessment, case management, sanctioning, or workforce development) will complete the state-sponsored domestic violence course. Certification of domestic violence training will be included in all contracts for such services. Gilpin County will verify that each contractor's staff member as described in this paragraph has been trained.

Signed by:

\_\_\_\_\_  
CHAIR, GILPIN COUNTY BOARD OF COUNTY COMMISSIONERS

\_\_\_\_\_  
DATE



*Gilpin County*

*Department of Human Services*

**POLICY**

POLICY TITLE <b>Nepotism   Conflict of Interest</b>	REFERENCE <b>C.R.S. CDHS Volume 3.603.1</b>
POLICY NO. <b>600 - CWP</b>	EFFECTIVE DATE <b>April 1, 2022</b>
DIVISION DIRECTOR APPROVAL	BOARD OF COUNTY COMMISSIONERS ADOPTION DATE

**BACKGROUND / PHILOSOPHY**

The Gilpin County Colorado Works program is designed to support all low-income families in their progression toward economic well-being. Gilpin County is committed to providing assistance and services to all those who qualify, including those employed by Gilpin County, or former employees of other counties in Colorado. Gilpin County will not discriminate nor show bias with these individuals and/or families. If a potential conflict of interest case is identified, a determination is made regarding the appropriate process and associated actions to be taken on the case.

**PURPOSE**

The purpose of this policy is to identify the mechanisms by which Gilpin County prevents conflict of interest or appearance of a conflict of interest from occurring within the department. To ensure that applicants are provided with assistance and services without concern for preferential or biased treatment by program staff, standards and procedures have been developed and outlined by Gilpin County and are followed by staff who play a role in the determination of program eligibility and case management functions.

**POLICY**

*Intake*

Applications submitted by an employee of Gilpin County will be processed in a fair and equitable manner and according to the same guidelines as all other applications. No applicant will be



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Office of Economic Security

Division of Employment & Benefits

discriminated against based upon the applicant's race, creed, religion, political affiliation, sexual orientation, or station in life. In the event an applicant is a blood-



relative, relative by marriage or adoption, former spouse or otherwise related to a Gilpin County employee or elected official, a close friend or any member of the department staff, or any other reasons exists which might create a potential conflict of interest, the Gilpin County staff member assigned to the case will immediately notify his/her supervisor. If the conflict of interest is associated to the supervisor's relationship with the applicant, the staff member will immediately notify the Gilpin County director.

Gilpin County relies upon the discretion and sound judgment of employees to identify situations as described above, and to follow the appropriate protocol. In the event that a staff member, customer, or citizen at large identifies a conflict on behalf of another entity who has not disclosed the potential conflict, such instances will be documented and shared with the supervisor and/or director as prudence requires.

The supervisor reviews the nature of the potential conflict of interest and determines how the application will be processed, which may include, but is not limited to:

- The Eligibility Program Manager processing the case and maintaining case assignment;
- Forwarding the application to a neighboring county for processing;
- Permitting a staff member to process the application and having the process reviewed by a neighboring county prior to benefit issuance;
- Reassigning the case to another Gilpin County staff member within the Department; or
- Permitting the original assigned county staff member to process the application through regular business process.

#### Ongoing

For Colorado Works customers who receive a benefit above and beyond basic cash assistance (e.g. supportive services, special needs payments, child care, monetary incentives, etc.) where a conflict of interest may exist, the supervisor and/or director will be notified for approval prior to issuance. Gilpin County makes every effort to ensure case managers are not asked to handle cases where a conflict of interest may be present, but recognizes that sometimes this cannot be avoided. In that circumstance, measures to ensure additional supervision will be made. Customers will be notified of this additional supervision immediately when conflict is identified, and the staff person will assist the customer in accessing the supervisor.

If questions and/or concerns arise regarding the possibility of a conflict of interest during case management or at any time throughout the life of the case, the case manager will consult with the supervisor immediately. The established guidelines as outlined in this policy will then be followed. Any employee who has reason to believe that another employee is providing a service to a Colorado Works participant that involves payment of governmental funds to the employee or household member of the employee, that employee shall notify the Gilpin County director immediately. In these instances, the county attorney may be consulted to ensure fidelity to the program is maintained; involvement of the county attorney will automatically result in notification to the state office as well.



Case File Maintenance

In all circumstances, sensitive cases and any associated records are kept confidential in a locked filing cabinet, separate from all other case files, and electronic files are password protected. Case management records and system case notes are only accessible to certain staff with a special security profile, authorized and granted by the system administrator. To assure compliance, Quality Assurance (QA) measures are implemented in Gilpin County to discourage and detect the occurrence of fraud, and include, but are not limited to the following:

- Gilpin County maintains a separation of functions within the department that are reasonable and required in relation to Department business processes.
- A periodic supervisory sampling of cases, including case reviews, to monitor the determination of client and vendor eligibility and the proper calculation and issuance of benefits
- The designated worker assigned to the case reviews and verifies all supporting documentation for information supplied by the applicant; and requests and verifies other pertinent information needed at intake and on an ongoing basis

Additional Criteria

At no time will a member of the Gilpin County staff accept any gift, service, or preferential treatment from an applicant. Any such offer will be reported to his/her immediate supervisor. Workers throughout the department are encouraged to report any concerns of suspected fraud. (See Gilpin County Fraud Prevention Policy; #700-CWP)

The County Director is notified in all potential conflict of interest cases.

Signed by:

\_\_\_\_\_  
CHAIR, GILPIN COUNTY BOARD OF COUNTY COMMISSIONERS

\_\_\_\_\_  
DATE



*Gilpin County*

*Department of Human Services*

**POLICY**

<p>POLICY TITLE</p> <p><b>Quality Assurance   Fraud Prevention</b></p>	<p>REFERENCE</p> <p><b>C.R.S. 26-1-112; 26-1-118; 26-2-703 (17.5) CDHS Volume III 3.609 CDHS Fraud Prevention Manual</b></p>
<p>POLICY NO.</p> <p><b>700 – CWP</b></p>	<p>EFFECTIVE DATE</p> <p><b>April 1, 2022</b></p>
<p>DIVISION DIRECTOR APPROVAL</p>	<p>BOARD OF COUNTY COMMISSIONERS ADOPTION DATE</p>

**BACKGROUND / PHILOSOPHY**

The fundamental values of the Gilpin County Colorado Works program include respecting the dignity and well-being of all people, promoting self-determination, honoring cultural diversity, advocating for social justice, and acting with integrity, honesty, genuineness, and objectivity. Program staff considers these standards in ethical and professional decision making. It is the intent of Gilpin County to promote consistent organizational behavior and develop effective working relationships with human services system and community partners. We respond to the direction of human needs and human circumstance and enhance customer safety, independence, functioning, health and well-being within the context of our community and environment. Likewise, we uphold the integrity and ethics of our own profession, and continually work to increase our professional growth. Finally, we recognize and build on customer and community strengths, and value the accountability of the use of public dollars by maximizing efficient use of resources.

**PURPOSE**

The Gilpin County Quality Assurance and Fraud Prevention policy is established to facilitate the development of systems that will aid in the prevention and detection of internal and external fraud. It is the intent of Gilpin County to take all allegations of fraud seriously, to investigate all allegations of fraud appropriately, to maintain procedures for



assessing the risk of fraud and to educate staff and partners at all levels on fraud awareness and relevant procedures.

This policy contains the standards and framework for the maintenance of program integrity that ensures program accuracy and prevents the misuse of benefits. This policy applies to any irregularity, or suspected irregularity, involving employees as well as customers, contractors, vendors, consultants, stakeholders, and/or other outside agencies with a business relationship with the department.

## **POLICY**

Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Gilpin County management staff is responsible for the prevention and detection of fraud.

### *Risk Assessment*

Each member of the management team will be familiar with the types of fraud that might occur within his or her area of responsibility. Management staff is aware of specific behaviors within their work group that can signal that the environment is at high risk for fraud. A risk assessment checklist has been developed and is used in each program area. Staff is prepared to prevent and/or minimize the development of these risks as well as manage these risks and their potential impact in a professional manner.

### *STRATEGIES*

#### Internal Controls

Fraudulent acts committed by employees of Gilpin County may include theft or misuse or misrepresentation of data for use in determining eligibility and grant amounts. Common methods and types of internal fraud identified by departments of human services include:

- Deliberate overpayment of benefits to customers
- Creating false persons and applications
- Reporting false information on behalf of the customer
- Transactions (expenses, income, etc.) recorded for incorrect sums
- Altering amounts and details on client documents/cases
- Over-riding denial/fail decisions so as to approve benefits
- Misappropriation of funds
- Unauthorized transactions
- False identification used
- Creating false addresses
- Reversing claims and overpayments without resolving
- Removing benefits from client accounts
- Falsifying documents
- Forged signatures
- Accessing benefits of deceased clients
- Claiming mileage for destinations not traveled



Management, in conjunction with Human Resources, will resolve irregularities concerning an employee's ethical or behavioral conduct.

Protocols | Other Criteria

(See Gilpin County Nepotism/Conflict of Interest Policy #600-CWP)

External Controls

Gilpin County addresses Fraud Prevention with our customers using a strength-based approach. We strike a balance between encouraging independence and family well-being and committing to the prevention, detection, and correction of misconduct and dishonesty. At eligibility, Gilpin County staff reviews and verifies supporting documentation provided by the applicant on the application, and requests pertinent information as necessary to determine program eligibility. Workers will, whenever possible, contact the county or state in which the applicant formerly resided (if applicable) to gather information needed to conform eligibility of the applicant including, but not limited to, previous eligibility, sanctions, work history, and fraudulent activities. A Gilpin County staff member verifies household composition, employment, and residence status by the following procedures which include, but are not limited to:

- Interfaces
- Collateral contacts
- Unannounced home visits
- Other legal means deemed necessary to determine eligibility

A Gilpin County staff member who discovers or suspects fraudulent activity will:

- Verify the fraud
- Establish a recovery for the over issuance period
- Document the recovery in CBMS case comments
- Complete an investigation referral form
- Attach the investigation referral form to case record and submit to supervisor for review
- Program Administrators review and approve the referral for investigation and forwards to the Fraud Investigator
- A record of all fraud referrals is maintained by the Administrator

Prudent Person Principle | Collateral Contact

When necessary and practical, Gilpin County implements procedures for independent verification of customer information. Gilpin County will check addresses, Social Security Numbers and other case information. Examples of checking on customer information include, but are not limited to:

- Checking addresses in Google, and/or other search engines
- Checking addresses with the county assessor
- Checking Social Security Numbers for validity or duplication
- Contacting Landlords/Car dealerships
- Confirming family membership and their identities
- Calling Employers
- Checking School records



### Monitoring

Gilpin County utilizes effective interviewing techniques throughout the life of a case to prevent and detect fraud. Additionally, Supervisors and Administrators run a variety of reports to review case work for abnormalities, payments over a specific threshold limit, Diversions, supportive services and other activities that may point toward fraud. The Administrators and the Business Office review payment patterns and statistics. Reports reviewed include, but are not limited to:

- Payments over \$1500.00
- Daily Issuance Participation Report
- Security Profiles in the Colorado Benefit Management System
- Supervisory authorization at specified levels of benefit approval
- Death Match Report
- PARIS
- Out of State Electronic Benefit Transfer (EBT) Usage
- Duplicate Social Security Number (SSN) Report
- IEVS Reports
- EBT Prohibited Access Reports

The Administrators and the Business Office use application logs and other internal tracking devices to cross reference specific case actions.

The Gilpin County Quality Assurance Team uses Transaction Case Sampling to pull a percentage of case actions for each worker. Supervisors then review and authorize. This process is instrumental in preventing and detecting fraud, and enhancing our ability to find errors, target training and staffing needs, and ensure that our customers are receiving appropriate benefits and services.

### Reporting Procedures / Fraud Investigations

Gilpin County staff are encouraged to report concerns to the Gilpin County Fraud Investigator, who prepares a written report for Administrators and the Business Office to review and determine what, if any, further action will be taken. Actions can include, but are not limited to:

- Determination that no fraud was committed
- Further investigation is required
- Determination of the amount of overpaid benefits
- Referral back to the case manager
- Termination of assistance
- Administrative hearings
- Referral for establishment of account receivable
- Referral to the District Attorney (DA) for prosecution



Confidentiality

Gilpin County staff and others involved in the process of fraud investigation treat all information received confidentially. Investigation results will be disclosed or discussed on a “need to know” basis only. This is important to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct. Any employee who suspects dishonest or fraudulent activity will notify the director, or designee, immediately, and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act.

Staff Training

New staff is trained at the time of hiring on the department’s values and code of ethics. The training explicitly covers fraud awareness and prevention with a positive tone, and stresses the expectations on all employees regarding their duty to communicate certain matters, specific examples of suspected fraud, and how to report. The Gilpin County fraud investigator conducts employee trainings and provides updated materials to employees on an annual basis. Ongoing training is offered through the Colorado Welfare Fraud Council (CWFC) and the state Division of Employment and Benefits Professional Development Academy.

Signed by:

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CHAIR, GILPIN COUNTY BOARD OF COUNTY COMMISSIONERS

DATE



*Gilpin County*

*Department of Human Services*

**POLICY**

POLICY TITLE <b>Substance Abuse Screening &amp; Treatment Program</b>	REFERENCE <b>C.R.S. 26-2-703          CDHS Volume 3.606.8; 3.608.1;          3.608.2; 3.608.3</b>
POLICY NO. <b>800 - CWP</b>	EFFECTIVE DATE <b>April 1, 2022</b>
DIVISION DIRECTOR APPROVAL	BOARD OF COUNTY COMMISSIONERS ADOPTION DATE

**BACKGROUND / PHILOSOPHY**

Gilpin County prioritizes effectively engaging with families to support their self-sufficiency goals. Employment is one of the best means achieving self-sufficiency goals and avoiding the future need for public assistance.

Gilpin County has flexibility in determining the most effective approach for accomplishing the four federal purposes of TANF; specifically, crafting services for families with challenges attaining and sustaining employment that appropriately and effectively address their needs and leads to economic security. This may include the identification and treatment of substance abuse as a hindrance to family self-sufficiency. Gilpin County is committed to ensuring all Colorado Works participants who demonstrate a substance or alcohol abuse problem have this need identified by a trained professional, and are presented with the opportunity to receive appropriate treatment as part of their overall path to self-sufficiency.

**PURPOSE**

The purpose of this policy is to outline a process for identifying criteria and pursuing screening and treatment options in a manner that is positive, respectful, and appropriate considering the overall goal of achieving economic security.

Gilpin County has identified several criteria that may, in the absence of other explanation or good cause, point to a potential substance abuse problem. These criteria, if observed and documented, may warrant a referral to substance abuse screening by an off-site certified



addiction counselor (CAC). At the point that substance abuse screening indicates the presence of an abuse situation, a treatment plan will be established and treatment provided free of charge to the participant, in accordance with program rule (CCR Volume 3).

## DEFINITION

**Substance Abuse:** A pattern of use of a drug (including alcohol and prescription medications) in which the user consumes the substance in amounts or with methods which are harmful to themselves or others. Use is differentiated from abuse, and is marked by behavior that is problematic and harmful; this is particularly relevant to the ability to attain and maintain employment, as well as ensure family well-being.

## POLICY

Gilpin County has outlined the following steps for determining an appropriate referral to substance abuse screening, and, if positive, support a treatment plan in conjunction with an individualized employment plan.

### Referral

A case manager may suspect that a participant is substance abuse involved based upon any of the following criteria, ***in the absence of any other explanation or good cause*** (e.g. known physical or mental health issues, domestic violence, etc.):

1. Observations of physical symptoms (slurred speech, confusion, smell of alcohol, or marijuana, etc.)
2. Chronic missed appointments without other explanation (3 in 6 months)
3. Child welfare referral indicating substance abuse
4. Self-declaration
5. Report from credible 3<sup>rd</sup> party
6. Lack of progress in individualized plans

If any of the above criteria exists, every reasonable effort should be made to establish good cause prior to initiating a referral to substance abuse screening. A referral for screening should take place only *after* a discussion with the participant has ruled out good cause or other contributing factors. The referral should be made in a respectful, courteous manner, and may be included as an element in the individualized employment plan, at the determination of both the case manager and the participant. If included in the individualized plan, it should be messaged as a resource and support to the participant's overall goal.

A participant has the right to refuse the referral. In the event that the referral is refused, the case will be staffed with the supervisor and possibly the Director to ensure a screening is in fact warranted. If staffing confirms the appropriateness of screening, and the participant continues to refuse to engage, the county will follow sanctioning and appeal policies as outlined in program rule.



If the participant agrees to screening, but does not show up for a screening appointment, the same protocol applied to other missed appointments/non-compliance will be followed.

Screening

Gilpin County Department of Human Services contracts with Jefferson Center for Mental Health for substance abuse screening by a Certified Addiction Counselor (CAC) who will recommend the best course of action. These screening services will be provided free of charge to the participant, and every reasonable effort to accommodate the participant's other obligations (e.g. work or childcare) will be made.

Treatment

Should the screening identify that the individual has a substance abuse problem; a treatment plan will be developed by the participant and the CAC. The conditions of the treatment plan may be included in the individualized plan, as appropriate, and the county may use a county-defined hold to enable the participant to engage fully with treatment, in combination (or in lieu of) other work activities, as recommended by the treatment provider.

The development and monitoring of the treatment plan and associated progress will be the responsibility of the CAC, with support as requested from the Colorado Works case manager. Treatment focus is to assist the customer to participate successfully in the Colorado Works program, and to attain economic security and well-being. Treatment may identify other physical and mental health needs, and efforts should be undertaken to satisfy those needs, as they relate to overall program success.

Signed by:

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CHAIR, GILPIN COUNTY BOARD OF COUNTY COMMISSIONERS

\_\_\_\_\_  
DATE