

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES PROGRAM (TANF)

TANF ECONOMIC AND WORKFORCE ANALYSIS

WORKFORCE DEVELOPMENT, EDUCATION, AND TRAINING ACTIVITIES ANALYSIS.

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of –

ECONOMIC AND WORKFORCE ANALYSIS

Workforce Development, Education, and Training Activities Analysis.

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- A. **The State's Workforce Development activities.** *Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop delivery system partners.*
- B. **The Strengths and Weakness of Workforce Development Activities.** *Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.*

TANF differs from the WIOA program in that its mission is defined by four statutory purposes that extend beyond work preparation and placement, and it measures performance based on a work participation rate.

The 1996 law sets forth 12 categories of work activities that can count toward the work rates; federal rules issued in 2008 provide additional detail about what can count in each category. Nine of these 12 categories are "core," meaning that they can count toward any hours of work participation for an individual. Participation in the three "non-core" categories generally counts only after the individual has completed 20 hours per week of core activities. Job Readiness Assistance and Job Search, Work Experience, Community Service Programs, Vocational Educational Training, Unsubsidized Employment, and Subsidized Employment are categorized as Core activities. Adult Education and Job Skills Training Directly Related to Employment are categorized as Non-Core activities. Thus, restrictions on what can count very often turn into restrictions on what activities a recipient is allowed to do.

This section provides a description of the workforce development activities listed under Tennessee's TANF program known as Families First. These services are delivered by the State's Employment and Case Management Services (ECMS) providers and are as follows:

Work Experience

Employment and Case Management Services (ECMS) providers will enter into agreements with employers to provide work experience in accordance with the Fair Labor Standards Act (FLSA). All work experience placements may be subject to FLSA requirements. The State will not count customers deemed ineligible for overtime as subject to the FLSA requirements per 29 CFR Part 541.

The purpose of work experience is to improve the employability of those who cannot find unsubsidized employment and may be used only if sufficient private sector employment is not available. Specified work experience placements may be offered to customers unable to locate unsubsidized employment. Work experience provides an individual with an opportunity to acquire the general skills training, knowledge, and work necessary to obtain employment.

A work experience placement is anticipated to lead to employment, with sustainable wages, that is expected to be available with the employer providing the work experience activity. The ECMS providers shall obtain a written agreement from the work experience site stating their willingness to hire at the end to the client's work experience placement period based on the following:

- a. the client's satisfactory performance; and/or
- b. the client's suitability for the position or skills that are transferable to another position.

Families First/TANF customers who are required to participate in Work Experience are unsalaried, but the ECMS provider shall compensate each client for the hours of participation through the deeming hours process pursuant to the requirements of the federal Fair Labor Standards Act (FLSA). Work Experience sites must be pre-approved in writing by the State to ensure the location meets requirements to accept placements prior to client engagement. ECMS providers will:

- a. Create and/or seek Work Experience assignments that align with the client's work employment aspirations and are congruent with the Individualized Career Plan (ICP).
- b. Develop a network of employers and community partners for Work Experience placements and maintain an adequate placement pool for customers.
- c. Maintain a work experience site files on an agency or specific site level.

Job Search and Job Readiness Assistance

Job search and job readiness assistance is the act of seeking or obtaining employment or preparation to seek or obtain. This also includes life skills training, substance abuse treatment, mental health treatment, or rehabilitation activities for those who are otherwise employable. The exact nature of the job search/job readiness activity will vary by client need as assessed by the Families First ECMS provider.

Job readiness activities prepare the client to enter into gainful employment with a focus on transitioning their families to self-sufficiency. Job readiness should include, but is not limited to, the following:

- a. Training activities to assist the client in recognizing and overcoming personal and family problems, which may be barriers to accomplishing employment and training goals.
- b. Training activities that prepare the client for work by assuring that he/she is familiar with general work-place expectations, work behaviors, attitudes necessary to compete successfully in the labor market, and the economic benefits of working.
- c. Promote training and lifelong learning to ensure job retention for either personal or professional reasons by the client.
- d. Short-term workshops to build skills in job search competencies, such as interviewing skills, instruction in work-place expectations, job coaching, and resume writing. Workshop topics shall include communication skills, motivational training, problem solving, assertiveness, nutrition, money management, time management training, and other activities that enhance specific work place expectations and behaviors.

- e. Life skills training, including basic life skills that help customers to succeed in the workforce shall be offered. Activities consist of the following topics balancing life and work; budgeting; household management; interpersonal skills; decision- making skills; and time management.
- f. Trainings may be conducted through sponsored workshops or seminars through treatment programs, other community service programs, or through one-on-one counseling.
- g. Mental health services, including medical or mental health treatment therapy, counseling, and other services to address mental or emotional disorders that can interfere with the client's ability to work or look for work shall be considered job readiness assistance. These services may be provided by a State contracted counseling service provider and/or other qualified medical, mental health, or substance abuse professional for the determination and modality of treatment. Also included in this treatment are domestic violence and rehabilitation services.

Weakness: Limitations on participation in job search/job readiness also can interfere with a state's development of the most effective plan to address barriers to employment that some families face. Many of the activities that some recipients need in order to become "work ready" — such as mental health counseling or participation in substance abuse treatment — count only under the category of job search/job readiness, and participation in that category can count for only four consecutive weeks and for only six (or 12) weeks out of a year. Thus, an individual assigned to complete a four-month, full-time substance abuse program would get credit for only a portion of the participation. In addition, since that individual would use up all of their countable weeks of job search/job readiness in that program, the State would not be able to count any of their job search efforts once they successfully completed the program.

Vocational Educational Training

Vocational Education activities must result in a portable, industry-recognized, state-certified credential in a specific occupation. Vocational Educational Training must be provided by education and training organizations certified by the State of Tennessee or a comparable certifying authority, which includes vocational-technical schools, community colleges, post-secondary institutions, proprietary schools, non-profit organizations, and secondary schools that offer vocational education. This does not include secondary school training and cannot be part of a secondary school degree. Vocational education activity may also include participation in a bachelor's degree or advanced degree program (as well as 2-year degree programs).

Weakness: Individual's participation in vocational education as a stand-alone activity to 12 months — even though many certificate vocational programs for jobs may require 18 or 24 months — because of a federal rule barring vocational education from counting toward the work participation rate for more than 12 months.

Job Skills Training Directly Related to Employment

Job Skills training directly related to employment is defined as any activity that is reasonably linked to a client's employability. Those activities may include but are not limited to the following:

- Office skills
- Basic computer literacy
- Driver's training
- Clerical skills
- Customer service
- Keyboarding

Post-secondary education that leads to a bachelor's or advanced degree may count as job skills training, if it is directly related to employment.

Weakness: The work rate requirements thus can heavily constrain a state's ability to use training and education, even where the evidence shows stronger employment outcomes for those who complete such programs.

Adult Education

Programs or services under this activity will include education related to a specific occupation, job, or job offer, such as courses designed to provide knowledge and skills for specific occupations or work environments, adult basic education, and ESL.

Weakness: Basic education and skills training are considered "non-core" activities and can count only toward the work rate on top of 20 or more hours of participation in other "core" activities. This does not match the approach of other workforce training programs under WIOA, where participation in training can be a full-time activity. Participation in basic education cannot count as a stand-alone activity except for teen parents.

Additional TANF program restrictions/limitations: The State gets credit only for placing recipients in a limited set of activities for a prescribed number of hours each week, and limits apply to the amount of time that State can count toward certain activities and the number of recipients that can count as participating in certain activities. The State is required to document and verify every hour of participation they count toward the work participation rate. They also must separately track each category of activities even if the participant is engaged in an integrated program of activities, such as work plus school plus job readiness. In addition, the State has a "work verification plan" that sets forth the procedures we will use to verify hours of participation; the State faces a fiscal penalty for not having or following verification procedures. The State must also include documentation of participation — generally signed written documentation of hours of work or attendance— in an individual's case file that's kept by their assigned ECMS provider. Hours of paid employment can be based on a pay stub and projected for six months, but the State must document all other activities in writing every month.

STATE STRATEGIC VISION AND GOALS

The TANF program plays a role in addressing employment barriers and connecting TANF recipients with an array of supportive services. Providing education, employment, and career development opportunities to Tennessee Department of Human Services (TDHS) customers are an important focus in Tennessee's TANF State Plan. The Department's goal is to partner with other government/community agencies to provide education, work experience, and employment/career resources to assist in moving Tennessee families forward by utilizing the Human Services Value Curve (HSVC).

The HSVC is a framework designed to help human services organizational leaders progress on a capacity-building journey. Leadership for a Networked World reviewed best practices and worked with practitioners as part of the Human Services Summit at Harvard University to develop a structure enabling organizations to gauge efficiency in achieving outcomes. The HSVC outlines regulative, collaborative, integrative, and generative outcome frontiers. In the regulative model, the focus is on serving people who are eligible for particular services while complying with categorical policy and program regulations. The collaborative model is a focus on supporting people in receiving the best combination of services for which they are eligible by working across agency and programmatic boundaries. The integrative model focuses on addressing the root causes of individual/ family needs and problems by coordinating and integrating services at an optimum level. The goal of the TDHS is to move through the regulative, collaborative, and integrative models to operate at a generative level in order to generate healthy communities by co-creating solutions for multi-dimensional families and socioeconomic challenges and opportunities. To do this, the TDHS has adopted a two generational approach.

The two-generation continuum puts the whole family on a path towards economic security. The focus is on creating opportunities to address both the needs of the parent and child together. The following tactics are and will continue to be utilized to assist customers enrolled in TDHS programs with education, employment, and youth components (i.e. TANF, SNAP, Child Support, and Vocational Rehabilitation, Child Care) in obtaining/retaining employment:

- Brain Science informed practices
 - Understanding that poverty affects executive functioning skills (i.e. focus, memory, the ability to set goals and to follow through, finding alternative solutions, and lack of knowledge and/or resources).
 - High stress circumstances compromise quality of decision making.
 - Understanding the lasting effects of poverty: Mental capacity to weigh choices and make decisions for the future is diminished.
 - Reducing Toxic Stress of customers by providing ease of access services
 - Assisting in developing Executive Functioning skills through a customized case management approach, focused on enlisting customers as active participants in their success model
- Strength Based Perspective - The Strength Perspective in Social Work Practice*
 - Every individual, group, family and community has strengths
 - Trauma and abuse, illness and struggle may be injurious but they may also be sources of challenge and opportunity.
 - Assume that you don't know the upper limits of the capacity to grow and change and take individual group, and community aspirations seriously.
 - We best serve customers by collaborating with them
 - Commitment to belief in Capacity and Resiliency
 - Every environment is full of resources

**Strength based principles adopted by Dennis Saleeby*
- Authentic Customer Engagement through Motivational Interviewing
 - Motivational interviewing is a collaborative conversation style of strengthening customers own motivation and commitment to change.
 - Person centered counseling style addressing the common problem of ambivalence about change.
 - Arranging conversations with customers to talk themselves into change.
- Management
 - Innovation, for DHS work-force development and training for motivational interviewing
 - Retaining internal knowledge through talent management
- Strategic Public-Public/Public-Private Partnerships
 - Partnering internally and with other government/community agencies to provide education, work experience, and employment/career resources to families for future on-going success.

STATE STRATEGY

The Department will explore workforce intelligence needs of customers, community employment partners, and other stakeholders as needed to identify current workforce needs and associated gaps in DHS customer employment opportunities and addressing methods to fill this gap by developing a strategy to disseminate to all partners and stakeholders qualitative and quantitative workforce intelligence by implementing strategies related to the following initiatives:

- Drive to 55
- Workforce Subcabinet

- Children's Subcabinet
- Full Partner Engagement and Re-alignment
- WIOA
- TCAT

Also, as a Department, moving towards a 21st Century Service Delivery Model is imperative to achieving stated goals of being a strength based, ease of service, technology driven, barrier removing organization. The Department will utilize the Human Services Value Curve (HSVC) and the Two Generation Approach to grow capacity and reduce dependency.

SECTION III: OPERATIONAL PLANNING ELEMENTS

STATE STRATEGY IMPLEMENTATION

(1) State Board Functions. Describe how the State board will implement its functions under section 101(d) of WIOA (i.e., provide a description of Board operational structures and decision making processes to ensure such functions are carried out).

The goal of the Department is to move towards a 21st Century Delivery Model to focus on creating intentional pathways to self-sufficiency through assisting DHS customers in developing individualized plans for employment through education, job skills training, community service, and work experience. TDHS is charged with evaluating, vetting, and providing quality candidates to employers from the DHS client base of over 500,000. Self-sufficiency is achieved through income, which is generated through meaningful employment: Meaningful employment is realized through proper education and training. A relatively wide range of activities, policies, practices, and programs will be employed to create a viable workforce post TANF program. Participation in these programs will support current and future business and industries. This is accomplished through Workforce Development and Employment for our customers and transformation of our staff. The Department of Human Services will utilize its current relationship with contracted TANF providers to provide customers with assistance related to Education (GED/HS Diploma attainment), Post-Secondary credentials, and Employment. The Department will partner with the Department of Labor and Workforce Development, Economic and Community Development, Tennessee Board of Regents, and other State agencies to ensure wrap around services are provided. The Department will also redesign the current work performance measures to support engagement of all recipients in activities that will prepare them for work. Performance outcomes will be tracked and reported to the State agency on a monthly basis. These contracted entities will also be responsible for tracking performance of the TANF customers after case closure to support the WIOA outcomes.

(2) Implementation of State Strategy. Describe how the lead State agency with responsibility for the administration of each core program or a Combined State Plan partner program included in this plan will implement the State's Strategies identified in II(c) above. This must include a description of –

(A) Core Program Activities to Implement the State's Strategy. Describe the activities the entities carrying out the respective core programs will fund to implement the State's strategies. Also describe how such activities will be aligned across the core programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies, as appropriate.

The points of service delivery (and the associated structures) that are common to both programs generally allow for easy coordination: entry points to service, upfront job skills and job readiness services, and job development and placement. In addition, the TANF program's mission extends beyond the delivery of

employment services, but focuses exclusively on serving low-income individuals with children, which is outlined in the various programs below.

Two-Generational Approach

Family Focused Solutions (FFS) provides assessments, case management, family and individual counseling, self-advocacy training, in-house services, financial management training to promote self-sufficiency, life skills training, and parenting skills training to Families First/TANF clients with employment barriers and/or parental involvement matters. Barriers include domestic violence, mental health disorders, substance abuse, learning or other disorders, children's health and/or children's behavioral disorders (i.e. coping with child's chronic illness/impairment, school progress, truancy, substance abuse, issues), teen/young adult pregnancy and parenting, clients that have been sanctioned, and clients who have reached a lifetime counter of 18 months or greater and have not shown progress towards employment goals. This goal is focused on the entire family and reducing barriers to increase accountability and employment outcomes. The program evaluates number of referrals, successful completion of treatment/service plans, participation rate, stabilization and work readiness, successful closures, and collaboration with outside providers.

Employment

The primary goal of Employment and Case Management Services (ECMS) is to effectively move Families First/ TANF clients towards greater levels of self-sufficiency through employment, training, and educational attainment so that they can increase their earnings and decrease their dependency on public assistance. The ECMS service providers utilize resources to work with all clients, regardless of their functional level and monitor their progress from Families First/TANF to self-sufficiency. The focus is on reducing barriers, improving provision of supportive services, improved supportive services, increased accountability, and employment outcomes. The program reports on outcomes such as education levels and status, employment status, wages earnings, employment industries, employment gains and retention, increase in weekly employment hours, cases closed due to an increased earned income.

Drive to 55 Initiative

Tennessee Reconnect is Governor Bill Haslam's initiative to help adults enter higher education so that they may gain new skills, advance in the workplace, and fulfill lifelong dreams of completing a degree or credential. As part of Tennessee Reconnect, all Employment and Case Management Services (ECMS) providers are encouraging client enrollment in one of our 27 Tennessee Colleges of Applied Technology (TCATs) to obtain and/or finish their degree or certificate. As of April 2015, ECMS providers are collecting data on clients pursuing a degree or certificate, clients that have completed a degree or certificate, and the clients' employment status. In addition, providers are assisting clients with gaining skillful employment within their area of study or certification.

(B) Alignment with Activities outside the Plan. Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

TANF

Coordination across programs generally aims to improve efficiency in service delivery and increase the effectiveness of the provided services. Currently, referrals from the TANF to the WIOA program occur only at a minimum level and usually for the purpose of accessing training funds, not for the purpose of receiving intensive career counseling or other services. To strengthen the coordination of services, the Department will work with the Department of Labor and Workforce Development to implement a standard referral or co-enrollment process of TANF customers to the WIOA program and implement an automatic WIOA referral policy for TANF customers after a specific timeframe or for specific purpose to promote a seamless transition between programs and affords customers easy access to an extended menu of services. The Department will

work with the Department of Labor and Workforce Development to determine the primary contact staff person (e.g. one from each program or integrated position) for co-enrolled customers and establish guidance for clear communication to occur to track participation and coordinate funding for support services. The Department will collaborate with the Department of Labor and Workforce Development to explore the use of a common employment or service plan across the TANF and WIOA programs to increase the understanding between the customer and program staff about the customer's status in terms of his or her employment or services plan and what the customer may need.

Also, coordinating the use of TANF and WIOA funding can maximize the resources available to support common services when individuals are co-enrolled in the programs. Therefore, the Department will explore ways with the Department of Labor where both the TANF and WIOA programs can establish informal efforts to assemble a package of services that best meets the needs of co-enrolled customers (e.g. co-enrolled customer take the nursing board examination and WIOA pays for the initial exam; if they fail the examination the first time, the TANF program pays for the second examination, and then the two programs split costs associated with the licensure; customer receives tuition assistance from WIOA to participate in a certified nursing program and the TANF program pays for associated certification fees).

Currently, access to training is the least coordinated strategy across the TANF and WIOA programs. Different emphases on education and training and variation in the availability of training funds have kept the TANF and WIOA programs functioning independently in the provision of training. However, development of a co-enrollment process in the TANF and WIOA programs for purposes of training will improve access and coordination of services. The Department will work in concert with the Department of Labor to ensure that a process is in place to refer TANF customers to the WIOA program within specific timeframe and/or purposes (e.g. refer TANF customers to WIOA for training assistance when a TANF recipient has a demonstrated need for a private education program; refer TANF customers to WIOA counselors if their participation in job search and job readiness activities does not lead to employment after two weeks). TANF customers may explore education and training options with WIOA staff at that time.

***(C) Coordination, Alignment and Provision of Services to Individuals.** Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high quality, customer-centered services, including supportive services to individuals including those populations identified in section II(a)(1)(B). The activities described shall conform to the statutory requirements of each program.*

Another way to look at the benefits of TANF and WIOA coordination is to consider the benefits or value added that each program brings to the services provided by the other, from both administrative and customer perspectives to enhance the services delivered to TANF recipients. Department will improve its coordination efforts through increased communication, promotion of cross-program knowledge, and cross-training among frontline TANF and WIOA staff to enhance the ability of each worker to address the customer needs and questions that may cross program lines. This process will limit the passing of customers between programs for answers to basic questions. As a goal for coordination across the TANF and WIOA programs, the Department will also work to streamline communication with individual program customers and improve access to services by ensuring the seamlessness among services. The benefits of seamless service delivery can take the form of improved program transparency and accountability as well as greater ease in obtaining and gaining access to needed services; thus, creating a seamless flow of employment readiness, career counseling, and training services to low-income individuals. In addition, the Department will explore coordination and delivery of services through co-location, where possible, making a range of services available to customers at one time and in one location. When TANF employment services are co-located within (or possibly next to) the One Stop Career Centers, other job seekers with barriers to employment can benefit from access to the array of on-site services targeted to TANF recipients.

Also, when a TANF customer is referred to and enrolled in WIOA, WIOA activities can be included in the TANF program agreement (and /or employment plan) and count toward work participation requirements. The Department will establish a clear referral or co-enrollment process and partnership between the TANF and WIOA programs can be of benefit in holding individuals accountable for participating in (and completing) WIOA activities as well as those of the TANF program. The work participation requirement of the contracted TANF program leads (i.e. Employment and Case Management Services (ECMS)) to monitoring of the work and work-related activities and hours each TANF recipient engages in during their period of cash benefits. Incorporating WIOA activities into the TANF customer plans will increase the incentive for and accountability of the TANF recipient to participate and ultimately complete activities, such as a training program. The benefit to WIOA is the increased tracking of participation by the contracted TANF program leads and, ideally, can improve training completion rates that support program performance.

The Employment and Case Management Services (ECMS) providers utilize the State's System of Record to record TANF case information including, attendance or non-attendance, work activity participation information, and case comments. ECMS providers are required under the terms of State contracts, to keep the following standards of documentation for all activities except teen parents in high school:

- a. The date of client referral from the State,
- b. Career assessment results and barrier assessment results,
- c. Signed individualized career plan (ICP),
- d. Documentation of support services to facilitate the individualized career plan,
- e. Documentation of advance notification to the client regarding work activity, location, and daily schedule,
- f. Documentation of actual hours of participation and non-participation in a work activity, categorized by activity,
- g. The reason for any absence and a determination as to whether the absence is excused or unexcused, or if the absence is due to activity site holiday policy,
- h. Documentation that Fair Labor Standards Act requirements have been met, if applicable,
- i. Documentation of GED and/or Vocational Rehabilitation enrollment and attendance, must include but not limited to:
 - i. verification from the office of registration;
 - ii. an online enrollment confirmation;
 - iii. a copy of the student's class schedule for the enrollment period and/or a certificate of completion and/or grades;
 - iv. verification that enrollment status was requested and documented every three months and or as least once each semester;
 - v. document weekly timesheets showing the daily hours of attendance in the client file as well as entry into the State's System of Record.
- j. Work activity placement information,
- k. Documentation of change in client compliance with his/her individualized career plan, and
- l. A written statement to include all pertinent client employment information to include the following:
 - i. Client's personal information full name, address, and contact number;
 - ii. Date of hire;
 - iii. Title of position;
 - iv. Total hours worked weekly;
 - v. Rate of pay;
 - vi. Pay frequency; and

- vii. Employer information to include the company name, address, contact number, title of person completing form, his/her signature, and date completed.

Tracking and verifying work activities is a time-consuming process for frontline TANF staff. The Department is exploring different strategies to reduce the time associated with such tasks to emphasize a focus on employment goals. In addition, we are implementing/piloting a highly automated process with a customer self-service model that places more responsibility on TANF customers to track and submit verified forms allowing frontline TANF staff to focus on case management and service delivery. Outcome goals have been set for all activities and all providers of services to assure clients receive the best available services in the shortest time possible. Client goals will be set with the ECMS contractor, keeping in mind the 60-month time limit.

Transportation and Support Services

Transportation and Support Services funds are available to assist the Families First/TANF clients in the elimination of barriers to participate in required work activities and to achieve self-sufficiency through employment. Support services shall include, but are not limited to, uniforms, interview clothing, specialized tools for training program, licenses and/or certification testing fees, vehicle repairs, medical services (i.e. hearing aids, dental service, optical), and counseling to address barriers to employment and/or educational goals. Gas cards or bus passes are given to clients on an as needed basis in order to commute to their assigned work activity. Child Care is also available to Families First/TANF clients to assist in the participation of required work activities.

***(D)Coordination, Alignment and Provision of Services to Employers.** Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs and to achieve the goals of industry or sector partners in the state. The activities described shall conform to the statutory requirements of each program.*

An ongoing benefit of coordination between the TANF and WIOA programs is the connection that WIOA services bring to employer and workforce needs. By utilizing the Labor Market Information (LMI) early in the service delivery process and throughout the TANF program, TANF recipients will be able to create employment and training plans based on industry needs in the local area, ensure a sound match with employers, and have an understanding between requested training and labor market demands based on the LMI. The Department will also explore ways that the coordination of services will benefit our employer customers. By coordinating employer outreach efforts across the TANF and WIOA programs or by integrating outreach responsibilities into shared staff positions, this would potentially strengthen the connection between these services and employer needs. The streamlined contact with employers across the programs would be less confusing to employers and can provide a better impression of the program agencies and their responsiveness in meeting employer needs. The Department will also contract with the workforce development providers and utilize the One Stop Career Centers to provide employment services to TANF recipients to strengthen the connection between these services and employer needs. Given the Career Center's history of working with employers and understanding workforce needs, the system is well positioned to connect job readiness, skill development, and job placement services for TANF recipients to the demands of local employers. Utilizing these partners will draw on the appropriate experience and knowledge to deliver employment services to TANF recipients. For example, WIOA customers, Unemployment Insurance recipients, and TANF recipients participate jointly in information sessions, workshops, and classes. For TANF recipients, the benefit of indistinguishable service flows can reduce the stigma associated with TANF receipt and provide opportunities to network and learn from a range of individuals seeking employment. Such support allows for a high level of coordination in strategies, particularly those focused on delivering upfront job search and job readiness services, along with job development and placement functions that serve individuals across the TANF and WIOA programs.

In addition, the Department's Family Assistance Service Center will explore inserting recorded messages into their hold loops (in English and Spanish) for customers needing assistance finding job opportunities in their area. The recordings will provide information on Tennessee Promise, Tennessee Reconnect and Adult Education as well as resources www.jobs4tn.gov and www.getonthecoach.tn.gov for employment resources. Since the Department averages 16,000-20,000 callers weekly, implementing the hold loop recordings and option for employment resources will ensure every caller will hear information regarding jobs in their area. The Department is also implementing kiosks centers that will be piloted in a few areas to allow customers to access information about public assistance, apply for assistance if needed, and access information about employment and apply for those opportunities. Also, the Department has developed a web portal through SharePoint to warehouse TANF customers' resumes for matching their job skills with labor demands.

(E) Partner Engagement with Educational Institutions. Describe how the State's Strategies will engage the State's community colleges and area career and technical education schools, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv).

The Department has partnered with Tennessee Colleges of Applied Technology (TCATs). With 27 locations across Tennessee, these institutes are designed to produce the technical workforce of tomorrow and upskill the workforce of today (TDHS clients). With an ability to quickly adapt and customize training, the TCATs are a go-to location for all technical training needs. The Department will track results of TDHS client TCATs results as follows: Show by district, how many completed TCAT certificates, percentage employed by field, percentage employed in something else, percentage unemployed. Also, the data will show by district, the fields they're employed in by percentage. After that, both of the previous measures statewide instead of by district.

STATE OPERATION SYSTEMS

Assessment and Evaluation of Programs and One-Stop Partners

(A) Assessment of Core Programs. Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

(B) Assessment of One-Stop Program Partner Programs. Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

(C) Previous Assessment Results. Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, provide the results of an assessment of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle). Describe how the State is adapting its strategies based on these assessments.

(D) Evaluation. Describe how the state will conduct evaluations and research projects on activities under WIOA core programs; how such projects will be coordinated with, and designed in

conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.

The Department will track client progress by district, number of completed Tennessee College of Applied Technology (TCAT) certificates, percentage employed by field of study, percentage employed outside field of study, and percentage unemployed. Then, track by district and State, fields of TDHS customer employment by percentage, as well as the core and non-core TANF Requirement Activities, in addition to the following WIOA standards.

- Adults and Dislocated Worker Measures
 - Entry into unsubsidized employment (Entered Employment) and percentage of participants in unsubsidized employment during second quarter after exit.
 - Retention in unsubsidized employment (Employment Retention) and percent of participants in unsubsidized employment during fourth quarter after exit.
 - Earnings change after entry into unsubsidized employment (Average Earnings) and Median earnings of participants in unsubsidized employment during second quarter after job exit.
 - Credential rate and percentage of participants who obtain a recognized post-secondary credential or diploma during participation or within 1 year after program exit.
 - In program skills gain and percentage of participants in education leading to credential or employment during program year, achieving measurable gains, measured in real time.
- Youth Measures
 - Placement in employment, education or training and percent of participants in unsubsidized employment during second quarter after exit.
 - Retention in employment, education, or training and percentage of participants in education, training, or unsubsidized employment; measured in quarter 4 after exit.
 - Earnings after entry into unsubsidized employment and median earnings of participants in unsubsidized employment during quarter 2 after exit.
 - Credential rate and percentage of participants who obtain a recognized credential or secondary diploma ensuring participation or within 1 year after program exit.
 - In program skills gain and percentage of participants in education leading to credential or employment during program year, achieving measurable gains, measured in real time.

Partnership between the TANF Employment Services (ES) and WIOA programs can be of benefit in holding individuals accountable for participating in (and completing) WIOA activities as well as those of the TANF program. The work participation requirement of the TANF program leads to monitoring of the work and work-related activities and hours each TANF recipient engages in during their period of cash benefits. Incorporating WIOA activities into the TANF customer's Individualized Career Plan (ICP), therefore, can increase the incentive for and accountability of the TANF recipient to participate and ultimately complete activities, such as a training program. The benefit to WIOA is the increased tracking of participation by TANF ES staff and, ideally, improved training completion rates that support program performance.

(8) Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities.

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) with regard to the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility.

Section VII: Program-Specific Requirements for Core Programs

The Tennessee Department of Human Services will refer all applicants and renewals who are disabled to the Division of Rehabilitative Services (DRS) to undergo an evaluation.

The DRS shall determine whether the Families First applicant/recipient is eligible for DRS services and whether those services would provide the individual an opportunity to voluntarily fulfill the Families First work and/or educational requirement.

Those who do not want to participate, who do not attend the referral appointment, or who do not comply at any time with DRS will retain their exempt status and will not be subject to sanction.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

TANF

- (a) *Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash Assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act).*

In conformance with Section 402 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193), the Tennessee Department of Human Services (DHS) shall administer and supervise the Temporary Assistance for Needy Families (TANF) Program, known as the Families First (FF) Program in Tennessee.

Assistance payments shall be made on a monthly basis for all eligible assistance groups using a standardized budgeting and payment method per assistance group size. The State has a gross income test, a consolidated standard of need, and a maximum standard payment amount per assistance group size. Some assistance groups receive a higher differential maximum payment amount, based on caretaker work exemptions. Disregards include a \$250.00 earned income disregard, a mandatory household member and income disregard for a three-month period beginning with the month following the month of marriage for new spouses (marriage during receipt policy), and child care disregards of \$200.00 per month for children under two years of age and \$175.00 per month for children two years of age or older, for parents who choose a deduction rather than having their child care paid directly to the provider by DHS.

The income standards are included in an attachment to the State Plan.

The State will continue to use fill-the-gap budgeting. Current month child support will be paid to the caretaker using the fill-the-gap budgeting method as permitted in Section 302 (e) of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996.

Families First payments shall be made through Tennessee's Electronic Benefit Transfer system to the caretaker, alternate payee, or protective payee. The payment will be made available on the first of each month for continuously eligible cases. Payments will be made from the date the signed application is received in the local office for all eligible applicants. Auxiliary payments will be issued to all assistance groups that have been underpaid.

Eligibility

Eligibility for Families First benefits will be determined based on the following criteria:

- The Assistance Unit (AU) lives in Tennessee.
- The AU includes either:
 - o A child under age 18;
 - o A child under age 19 who is expected to complete high school or an equivalent vocational/technical training on or before his/her 19th birthday;
 - o A pregnant woman in her last trimester; or
 - o The otherwise eligible parents or caretakers of a SSI child.
- The children live in the home of a parent or a relative who maintains care and control of the child.
- All members of the AU are citizens or qualified aliens and have provided a Social Security Number.
- Child(ren) meets deprivation standards based on the absence, death, incapacity, or unemployment of a parent.
- Households meet income eligibility, including an income test and a resource test.

All AUs will be subject to a 60-month lifetime limit of Families First assistance. Months of TANF-funded assistance received in other States will count toward the lifetime limit. Those AUs that reach their 60-month limit and are exempt from the Families First work requirement and otherwise eligible may be considered for an extension. No more than 20% of the caseload can be on an extension at any given time.

(b) Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act)

AUs with eligible adults who are not exempt must engage in 30 hours a week of countable work or training activities with the exception of those individuals who require a reduction in activity hours due to an Americans with Disabilities Act modification. The federally countable work activities being utilized in Tennessee are:

- Unsubsidized employment;
- Subsidized employment in the public or private sector when funding is available;
- Job Search and Job Readiness Assistance;
- Community Service;
- Work Experience;
- Vocational Education Training;
- Job skills training directly related to employment; and
- Adult Education (education directly related to employment).
- Vocational Rehabilitation

Families First use the federal definitions for the countable work activities. AUs with a work requirement will receive cash assistance as long as they comply with program requirements or meet the 60-month time limit.

All provisions of the Fair Labor Standards Act will apply to Work Experience and Community Service activities, including maximum number of hours and displacement safeguards. Work Experience is limited to six months and Community Services to three, with some exceptions.

Tennessee is divided into (8) eight Districts that cover all 95 counties across the State for the provision of work activities and supportive services. The Employment and Case Management Services (ECMS) Contractor is responsible for each district. After eligibility is determined and a referral is received from the district, the Contractor will complete an assessment and work with the client to develop an Individualized Career Plan (ICP) to determine job readiness. The ICP will outline their specific work requirements according to federally countable work activities and provide supportive services if needed. Individuals determined to be ready to engage in work will be immediately placed in work or work-related activities for up to 30 hours per week. After receipt of assistance for 24 months, all individuals not already participating in such activities will be required to engage in work activities, as defined in state policy. This excludes a single custodial parent caring for a child under age 6 who refuses to engage in work requirements and is able to demonstrate an inability to obtain needed child care.

Certain AUs will be exempt from the work requirement based on the following criteria:

- The caretaker is 65 years old or older;
- The caretaker is disabled;
- The caretaker is temporarily incapacitated;
- The caretaker is caring for an in-home disabled relative;
- The single parent caretaker is caring for an infant less than 1 year of age;
- The two-parent household is caring for an infant less than 16 weeks of age.

(c) Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific analysis of how the State's workforce development activities are addressing employment and training services for parents or caretakers receiving assistance.

Families First will employ the following strategies for work and self-sufficiency:

- Families First participants will have goal-oriented, time-limited, Individualized Career Plans that carry them through logical and productive steps to self-sufficiency;
- Sanctions will be imposed when a family fails to comply with the Individualized Career Plan without good cause;
- Cash benefits will be limited to 60 months of eligibility in a lifetime, with some exceptions; and
- FF Participants who become employed and lose cash benefits may qualify to receive transitional child care assistance and transitional Supplemental Nutrition Assistance Program (SNAP) benefits.

Outcome goals have been set for all activities and all providers of services to assure clients receive the best available services in the shortest time possible. There is not a target goal set for transitioning clients off Families First. Client goals will be set with the ECMS contractor, keeping in mind the 60-month time limit.

The Secretary of State was sent a notification from the Governor of Tennessee opting out of the provision to require a FF parent or caretaker receiving assistance for two months who is not exempt and who is not employed to participate in community service activity. The State plan requires all non-exempt individuals to have an Individualized Career Plan.

Diversion Program

Tennessee will operate a Diversion program to serve families who do not need ongoing assistance, but could achieve self-sufficiency and economic security with a lump sum payment.

An Assistance Unit (AU) must meet all of the following criteria to receive a Diversion payment:

- Families First eligibility criteria;
 - The Assistance Unit has demonstrated residency in Tennessee for 6 months;
 - The primary caretaker has a recent job history;
 - The Assistance Unit does not face any major barriers to employment, such as drug/alcohol abuse;
 - The primary caretaker has at least a high school diploma or equivalent; and
- The household is facing a one-time financial need, and the Diversion payment would prevent ongoing need for TANF assistance. Money can be used for housing, transportation, child care, or job needs.

The Diversion payment will reduce the temporary cash assistance lifetime limit of sixty (60) months eligibility by the number of months the applicant receives a Diversion payment

Those who accept the Diversion payment will be ineligible to receive another Diversion payment or Families First cash benefits during the diversion months of assistance. Employed Diversion recipients may be eligible for up to three months of subsidized child care.

Sanctions

Sanctions shall be applied to all cases that are not in compliance with their Personal Responsibility Plans. A sanction may result in a percentage reduction in benefits for failure to provide immunizations, health checks, attend school, or ensure satisfactory attendance and/or progress of school aged children. Total assistance

group ineligibility will be applied if the family fails to cooperate with child support or comply with their Individualized Career Plan activities without good cause.

Other Program Policies

Families First AUs have access to child care. AUs with an eligible adult can access Families First Child Care if they are engaged in countable work and/or training activities and require child care in order to participate. In addition, individuals who are exempt from a work requirement, but wish to volunteer for work/training activities may have access to child care. There is no co-pay fee.

Certain child-only Families First cases are eligible for At-Risk Child Only (ARCO) child care if funding is available.

Former Families First recipients who are employed or participating in an approved work and/or educational activities at least 30 hours a week can receive up to 18 months of Transitional Child Care (TCC) after their cases are closed. TCC eligibility begins the first day of the month after the Families First (FF) cash assistance ends, however, the individual may not “qualify” for TCC until a later date. There is a co-pay fee for ARCO and TCC.

Families First AUs will be reviewed annually for continued eligibility.

If a single parent marries during the receipt of Families First assistance, he/she may choose to exclude the new spouse from the AU for 3 full months, regardless of income. Following the 3 months, the AU must meet TANF eligibility requirements to continue to receive assistance.

A Family Cap will be applied when a child is conceived and born during a period of eligibility. It may also be applied to a child born after or during a period of ineligibility, but within 10 months of a reapplication month. Exceptions will be granted when the birth is the result of rape or incest or when the birth is the first child born to a minor in an assistance unit.

(d) Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)

Privacy Provisions

The rules of the Families First program regarding the use and disclosure of information about individuals and families receiving assistance are consistent with the rules that guided the program under Title IV-A of the Social Security Act prior to the enactment of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, thus protecting the rights of individuals and permitting the release of information to programs operating in connection with the TANF Program; i.e., federally funded or federally assisted programs providing assistance on the basis of need, appropriate audit, and appropriate local, State, and federal law enforcement officials.

(e) Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act)

Efforts to Reduce Out-of-Wedlock Pregnancies

“What’s the Rush?” is a Statewide initiative of the Tennessee District Attorneys (DA) General Conference aimed at raising awareness of the legal, financial, and social consequences of teen pregnancies Statewide.

“What’s the Rush: Don’t be a Teen Parent” Campaign, provides informational videos and pamphlets via the DA’s Website. “What’s the Rush?” printed materials and videos were created for the DAs, Assistant District Attorneys (ADAs) or staff members to use when visiting schools and civic organizations to educate Tennessee’s youth about the consequences of becoming teen parents. These materials may also be provided to health departments, the Department of Human Services, courts, and other State-wide partners.

The Tennessee District Attorneys Conference created the campaign in 2008 in response to the number of court cases involving teen parents throughout the State. The following clause is included in the State of Tennessee’s contract with the DAs:

“A.39 The grantee shall conduct a teen pregnancy prevention campaign with a goal of decreasing the number of child support cases. This program shall target and provide resource materials to every high school and health department in the State. Further, the program shall be promoted, and readily assessable to teens through various means including, but not limited to, a web site, billboards, and other outreach efforts.”

(f) Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act)

Efforts to Reduce Statutory Rape

The Department of Human Services (DHS) recognizes the correlation between teenage pregnancy and the possible occurrence of statutory rape by men.

- In Tennessee, **statutory rape** is defined as the unlawful sexual penetration of a victim by the defendant or of the defendant by the victim when:
 - The victim is at least thirteen (13) but less than fifteen (15) years of age and the defendant is at least four (4) years but less than ten (10) years older than the victim; or
 - The victim is at least fifteen (15) but less than eighteen (18) years of age and the defendant is more than five (5) but less than ten (10) years older than the victim.
- **Statutory Rape** is a class E felony. Punishment for a Class E felony is a prison sentence ranging from 1-6 years.
- **Mitigated Statutory Rape** is the unlawful sexual penetration of a victim by the defendant, or of the defendant by the victim when the victim is at least fifteen (15) but less than eighteen (18) years of age and the defendant is at least four (4) but not more than five (5) years older than the victim. **Mitigated Statutory Rape** is a class E felony.
- **Aggravated Statutory Rape** is the unlawful sexual penetration of a victim by the defendant or of the defendant by the victim when the victim is at least thirteen (13) but less than eighteen (18) years of age and the defendant is at least ten (10) years older than the victim. **Aggravated Statutory Rape** is a class D felony. Punishment for a class D felony is a prison sentence ranging from 2-12 years.

Local DHS offices will provide printed material regarding statutory rape to be displayed in DHS offices, contracted agencies, local schools, and other prominent public places where clients and related individuals, including the men who have allegedly committed the crime, can view the material. DHS staff will notify the proper authorities of a possible occurrence of statutory rape when an applicant for Families First or other programs designed to provide related services is:

- Thirteen (13) years of age but less than eighteen (18) years of age; or
- A parent, legal guardian, or custodian on behalf of such person.

(g) Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller

machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act)

(h) Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)

TANF Electronic Benefits Transfer (EBT) Restrictions Requirements

Tennessee EBT restrictions law became effective July 1, 2014. The Department of Human Services Program Integrity Unit (PIU) provides a list of restricted transactions from the PIU's monitoring efforts to our EBT vendor on a quarterly basis (at a minimum) to have ATMs at the restricted locations "Blocked" from accessing TANF benefits. Restricted locations for TANF transactions include any liquor store; any casino, gambling casino, or gaming establishment; or any retail establishment which provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment. The DHS PIU will continue to monitor TANF transactions on a quarterly basis (at a minimum) to identify any new or additional restricted locations and block ATM EBT access. The DHS PIU Division will determine and establish claims in the amount of benefits accessed in restricted locations by TANF recipients on and after July 1, 2014. Following appropriate investigation, the DHS PIU Division may also assess penalties on the businesses that violate the Federal and State law.

We will work to ensure that our TANF recipients have adequate access to their cash assistance. Business owners will provide the DHS PIU Division with ATM location details. Based on that information, the PIU will assess the restricted locations to determine if there are other nearby unrestricted businesses where benefits can be accessed. If there appears to be an access problem, the DHS PIU will then notify the EBT/TANF Restriction team concerning locations where an individual may not have adequate access to cash assistance as mandated by Federal and State law. If an access problem has been identified, the DHS team along with PIU will work with businesses in order to purchase POS systems that will be able to be used by individuals without being charged a surcharge fee. The Tennessee EBT Cash Access Location Report is available on www.tn.gov. This report provides POS locations throughout the State of Tennessee with and without surcharge fees.

From analyzing the recipient data, locality information (addresses) where transactions occur will be cross-referenced with the ATM locality information from the self-reports of business owners in the area. This analysis will help us determine if there are "clusters" of transactions in particular locations that are restricted. If there are "clusters" of activity around a particular restricted location, the area will be investigated, as will other businesses or locations in the surrounding vicinity, to determine non-restricted areas where EBT cards can be used with minimal or no surcharge fees. We will advise clients by letter of the non-restricted ATMs and their locations.

DHS TANF recipients will have the opportunity to appeal any potential claim for using their benefits in a restricted location.

Beginning July 1, 2016, the effective date of Tennessee tobacco store EBT restriction law, TANF recipients will be prohibited to use their (EBT) cards at licensed retail stores that derive their largest category of sales from loose tobacco, cigars, cigarettes, pipes, and other smoking accessories.

DHS TANF recipients will have the opportunity to appeal any potential claim for using their benefits in a restricted location.

Brochures are provided by our EBT vendor, to every recipient who uses an EBT card to access his/her benefits. These brochures thoroughly explain use, fees, possible surcharges that apply to electronic fund transactions, and penalties for illegal use including those for use at restricted businesses.

(i) Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)

Out-of-State Families

The State will continue to apply Families First policies to all applicant/recipients who are residents, including those families who were past recipients in another state and move to Tennessee. The policies and procedures of the Families First Program will be applied uniformly to current and to new State residents. Families seeking the Diversion payment must demonstrate 6-months of residency in Tennessee and have not received a Diversion payment in any other state.

(j) Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)

Treatment of Non-citizens

The State will provide assistance to non-citizens using the rules outlined in the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, the Trafficking Victim Protection Act of 2000, and federal rules regarding certain battered women and children. The State does not offer State-Only funded programs for non-citizens. The current Families First policy allows eligibility for individuals with the following non-citizen status and length of time in the U.S.:

- Refugee (admitted under Section 207) in the U.S. less than 5 years
- Asylee (admitted under Section 208) in the U.S. less than 5 years
- Deportation Withheld (under section 243(h)) in U.S. less than 5 years
- Honorably Discharged Veterans
- Armed Forces Active Duty
- Spouse/Child/ of Veteran
- Spouse/Child of Armed Forces Active Duty
- Hmong or Highland Laotian
- Spouse of Hmong or Highland Laotian
- Dependent Child of Hmong or Highland Laotian
- Filipinos who are considered US Armed Service Vets
- Legal Permanent Resident (LPR) with 40 Qualifying Quarters
- Legal Permanent Resident (LPR) ins US more than 5 years
- Amerasian Immigrant in U.S. less than 5 years
- Cuban/Haitian Entrant admitted under Section 21 (h)(5) in U.S. less than 5 years
- Conditional Entrant (admitted under INA Section 203 (a)(7) in eligible status for more than 5 years
- Parolee (status granted under INS Section 212 (d)(5) for 1 or more years – entry date on or after 8/22/96 after in “parolee” status for 5 or more years
- Trafficking Victims in accordance with 107(b)(1) of the Trafficking Victim Protection Act of 2000
- Certain Women and Children in battered status and in the U.S. less than 5 years
- Afghan Special Immigrant admitted under 101 (a)(27) effective 12/26/2007
- Afghan Special Immigrant admitted under 101 (a)(27) effective 12/19/2009 (in U.S. less than 5 years
- Iraqi Special Immigrant admitted under 101 (a)(27) effective 1/28/2008

- Iraqi Special Immigrant admitted under 101 (a)(27) effective 12/19/2009 (in U.S. less than 5 years)

(k) Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act)

Ensuring Program Integrity

Program integrity is twofold. It includes both the provision that benefits must be provided timely and provided correctly and that recipients are provided with an avenue to voice their complaints/concerns through an appeal process.

Appeals are handled by our Appeals and Hearings Division, an entity whose only purpose is to fulfill the function of determining whether the correct action was taken on a case when that action has resulted in client dissatisfaction. Any applicant for, or recipient of, Families First may file an appeal through the county office, district office, State Office, or our Family Assistance Service Center. Every applicant/recipient is informed of his/her right to appeal if he/she is aggrieved by an action or lack of action by DHS. Anyone who applies or wants to apply for Families First benefits is given an informational pamphlet that explains the right of Appeal and Fair Hearing, the method by which a hearing may be obtained, and that his/her case may be presented by a household member or a representative. All applicants/ recipients are informed about these rights.

Resources that were previously used for quality control purposes in the Aid to Families with Dependent Children (AFDC) program were redirected to monitor and evaluate Families First. Focusing on outcomes rather than process will continue to ensure accountability. A method remains in place to ensure that payment accuracy and standards of promptness are achieved. An Active Case Review team will review a statistically valid sample of cases that are actively receiving Families First (those not slated for closure); to ensure policy and payment accuracy and that appropriate case management services are provided. The results of these reviews are provided to the management team of each area in the State and are used to determine areas where additional training may be needed. Individual errors found in cases are also addressed and corrected.

(l) Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—

(1) providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or

(2) in other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.

Patient Protection and Affordable Care Act of 2010

The Families First Program does not intend, at this time, to develop a specific program to assist individuals to train for, seek, and maintain employment in:

- Providing direct care in a long-term care facility (as such terms are defined under Section 1397j of Title VI; or
- Other occupations related to elder care determined appropriate by the State for which the State identifies an unmet need for service personnel.

The State ECMS Contractors currently assist some Families First recipients with work and/or educational training that apply to the above criteria as part of their general work requirement activities based on their needs and abilities.

(m) Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)

MOE Programs

Tennessee has discontinued providing Families First assistance and services to some eligible families under a Separate State Program (SSP), using only State Maintenance of Efforts (MOE) funds. The State's MOE funds can be spent in any of the following categories: cash assistance, work/training related activities and associated support services, child support pass-through, Families First Program Administration, and Families First TANF MOE Child Care. The State does not currently have any SSP MOE Programs.

Public Involvement

Local governments have numerous opportunities to be involved in Families First and many serve as service contractors for education, training, or child care services. Urban county governments provide education and training services through sub-contracts with Families First Employment and Case Management Services (ECMS) Providers. Local Human Services offices are used in many instances for co-location of local government and in some instances, Human Services caseworkers are stationed in local training centers.

In 2004, a Governor's task force comprised of business leaders, former and current Families First clients, advocates, contracting agencies, and senior Department of Human Services officials came together to recommend ways to improve the program with the goal of "enabling even more Tennesseans to become self-sufficient, tax-paying citizens." Another goal of this group, in anticipation of the loss of Tennessee's waiver in June 2007, was to ensure a smooth transition into compliance with all anticipated Federal requirements. The findings and recommendations of this group helped to shape the current post-waiver Families First Program in Tennessee.

The State continues to uphold efforts to improve the Families First Program through public involvement by meeting on a quarterly basis with advocates groups to discuss the state of the Families First Program and proposed improvements.

Americans with Disabilities Act Provisions

The Families First Program, including any contracting agencies providing services to Families First clients, will comply with all ADA provisions in the application of policy and provision of services.

TANF Certifications

The State will operate a program to provide Temporary Assistance to Needy Families (TANF) so that children may be cared for in their own homes or in the homes of relatives, to end dependence of needy parents on government benefits by promoting job preparation, work, and marriage, to prevent and reduce the incidence

of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and encourage the formation and maintenance of two-parent families.

The program is known as Families First.

The Executive Officer of the State is the Governor of Tennessee

In administering and operating a program that provides Temporary Assistance for Needy Families with minor children under Title IV-A of the Social Security Act, the Tennessee Department of Human Services will:

1. *Operate a Child Support Enforcement program under the State plan approved under Part D.*
2. *Operate a foster care and adoption assistance program, through The Department of Children Services (DCS), under the State plan approved under part E, and the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State plan under title XIX.*
3. *Specify which agency or agencies will administer and supervise the program under part A in all political subdivisions of the State:*

A. The Tennessee Department of Human Services is the agency responsible for administering and supervising the program;

B. Assure that local governments and private sector organizations have been consulted regarding the plan and design of Families First services in the State so that services are provided in a manner appropriate to local populations; and have had at least 45 days to submit comments on the plan and the design of such services:

- The Families First program will be governed by State Rules. As changes are needed for policy, proposals for changes to the State Rules are submitted as needed.
- Since Families First was implemented, DHS staff has met regularly with statewide advocates on the continued progress of the program.
- Make available to the public a summary of the State Plan.

4. *Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a Tribal Family Assistance plan approved under Section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government.*

5. *Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage.*

6. *Establish and enforce standards and procedures to ensure that domestic violence is addressed and victims are accommodated.*

(i) screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;

(ii) refer such individuals to counseling and supportive services; and

(iii) waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.

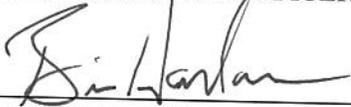
Domestic Violence Provisions

- The State has established and is enforcing standards and procedures to:
 - Screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;
 - Refer such individuals to counseling and supportive services; and
 - Make accommodations to other program requirements as listed below for:
 - Individuals receiving assistance in cases where compliance with such requirements would make it more difficult to escape domestic violence, or –
 - Would unfairly penalize such individuals who are or have been victimized by such violence, or
 - Individuals that are at risk of further domestic violence.
- The State will make special provisions/accommodations to victims of domestic violence.
 - Accommodations will be made to program requirements where compliance makes it more difficult for individuals receiving assistance to escape domestic violence or would put such individuals at risk of endangerment. Those requirements could include:
 - Work requirements;
 - Child support cooperation; and/or
 - Family cap provision.
 - Accommodations will be made as determined by the individual assessment which is administered by an individual trained in domestic violence counseling. The needs of these individuals will be reassessed as needed.
 - Families First Program will continue to work with these families to help them move into work activities to the extent consistent with the basic provisions of the Family Violence Option (FVO).
 - The State will provide clinical social workers/counselors trained in domestic violence. Services will be available as long as the participant is receiving cash assistance.
 - The State will provide an aggregate figure of the total of good cause domestic violence waivers granted.

CERTIFIED BY THE CHIEF EXECUTIVE OFFICER OF THE STATE

7-28-2016

Date



Bill Haslam, Governor

FUNDING

Section 403 (a)(1)(A) Of the Social Security Act provided that each eligible State shall be entitled to receive a grant in an amount equal to the State family assistance grant as defined in section 403(1)(1)(B).

Section 7101(a) of the Deficit Reduction Act provides that activities authorized by Part A of Title IV of the Social Security Act shall continue through September 10, 2010 or a subsequent date as amended.

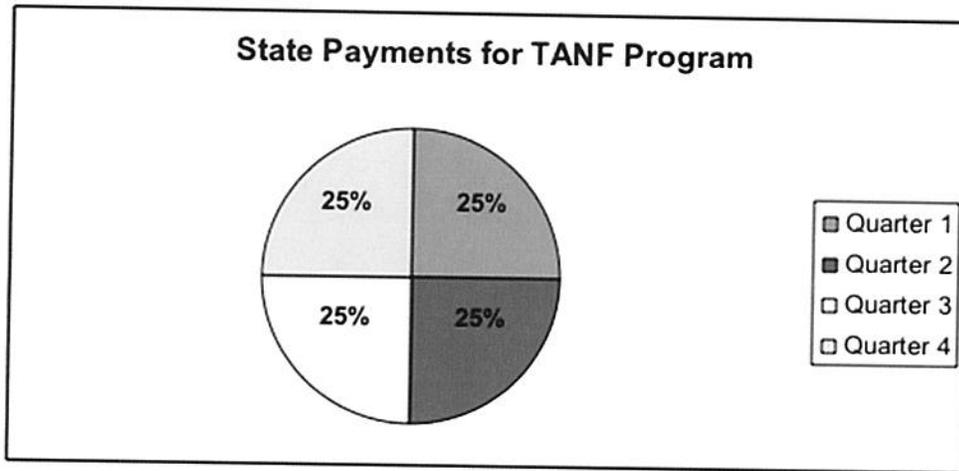
Payments to Agency Administering the TANF Program

Payments for the TANF Program in Tennessee will be made to the Tennessee Department of Human Services.

State Payments for TANF Program

Section 405 requires that grants be paid to States in quarterly installments, based on State estimates. The State's estimate for each quarter of the fiscal year by percentage is:

For FY 2007 and Future Years



Contingency Funds

Tennessee may seek to access TANF Contingency Funds when triggers and requirements are met.

FAMILIES FIRST NEED/PAYMENT STANDARDS EFFECTIVE 7/1/08:

Number of Persons in AU	1	2	3	4	5	6	7	8	9	10
Gross Income Standard	1288	1658	1972	2240	2470	2666	2838	2991	3128	3256
Consolidated Need Standard	696	896	1066	1211	1335	1441	1534	1617	1691	1760
Standard Payment Amount	95	142	185	226	264	305	345	386	425	467
<i>Differential Grant Payment Amount</i>	<i>140</i>	<i>192</i>	<i>232</i>	<i>242</i>	<i>291</i>	<i>305</i>	<i>345</i>	<i>386</i>	<i>425</i>	<i>467</i>

Number of Persons in AU	11	12	13	14	15	16	17	18	19	20
Gross Income Standard	3374	3487	3596	3702	3802	3898	3987	4064	4129	4175
Consolidated Need Standard	1824	1885	1944	2001	2055	2107	2155	2197	2232	2257
Standard Payment Amount	508	549	589	630	670	711	750	790	831	871
<i>Differential Grant Payment Amount</i>	<i>508</i>	<i>549</i>	<i>589</i>	<i>630</i>	<i>670</i>	<i>711</i>	<i>750</i>	<i>790</i>	<i>831</i>	<i>871</i>