AGENDA ITEM or FINAL CONTRACT REVIEW SUBMITTAL FORM

Agenda Item: ColoradoWorks Policy; Department of Health & Human

Action Requested: Board of County Commissioners' Signature

Parties to the Agreement: Gunnison County

Term Begins: **Term Ends:** **Grant Contract #:**

Summary:

this policy is being resubmitted after striking two items from the policy per conversation with David Baumgarten and Joni Reynolds

Fiscal Impact: 0

Submitted by: elizabeth Holena **Submitter's Email Address:** elizabeth.holena@state.co.us

Finance Review: (●) Required ( ) Not Required

Comments:
No concerns. ln

Reviewed by: GUNCOUNTY1\lNienhueser Discharge Date: 8/17/2018

County Attorney Review: (●) Required ( ) Not Required

Comments:
ok db 8/16/18

Reveiwed by: GUNCOUNTY1\dBaumgarten Discharge Date: 8/16/2018 Certificate of Insurance Required Yes ( ) No (●)

County Manager Review:

Comments:

Reveiwed by: GUNCOUNTY1\khaase Discharge Date: 8/17/2018

(●) Consent Agenda ( ) Regular Agenda ( ) Worksession Time Allotted: 0

Agenda Date: 8/21/2018

Revised April 2015

Gunnison County Department of Health and Human Services		
Title: **Policy # 2 Diversion(State and County)Program**	Original Date: 4/1/2016	Author: E. Holena
	Effective Date: 4/28/2017	Revision Date:
References: C.R.S. 26-2-706.6 CDHS Volume 3.606.8		
Impact Areas: **TANF**		

BACKGROUND

Gunnison County HHS 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, Gunnison County HHS provides a diversion cash assistance program for qualified families.

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.

In Gunnison 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, Gunnison County HHS will determine that ongoing need is not anticipated.

POLICY

Gunnison County HHS provides cash or cash-equivalent payments
not to exceed $2,400 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. 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 Gunnison County HHS, 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 employment during the POI
- Have stable housing
- Have another reliable source of income

Gunnison County HHS will not provide diversion payments to cover recurring housing costs.

Assessment

Gunnison County HHS Department strategy for assisting Colorado Works/TANF eligible families experiencing "family issues" which threaten the family's ability to maintain a common home. HS conducts in-depth assessments of family members who have been determined to be a part of the assistance unit at application. A Gunnison County HHS staff member 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. Gunnison County HHS staff engages 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.

All clients receiving diversion will complete an Individual Responsibility Contract (IRC):

- Documents "why" a County Diversion, or and Emergency Grant, or a Family Preservation Grant is recommended.
- Define expectations and terms of the Grant for both parties.
- Specify the need(s) for and the specific type(s) of non-recurring cash payments of the Grant.
- Specify the possible impact on other assistance including Medicaid, Food Stamps, Child Care.
- Client agrees to not apply for further Colorado Works assistance in Gunnison-Hinsdale or other Colorado counties for 12 months (unless otherwise approved by the Director).
- By demonstrating 'good cause' (beyond the clients control), is unable to sustain the IRC, he/she may apply for BCA.

Restrictions

Gunnison County may refuse assistance:

- If applicant has been convicted of welfare fraud in a court, or signed an Intentional Program Violation wavier form, or has not made restitution for a monetary claim.
- The Period of Ineligibility, POI should begin on the first day of the month following the last diversion payment in the event the payment is broken into more than one payment.

Applicant is ineligible if:

- Failure to provide required documentation.
- A fugitive felon, parole violator, or probation violator.
- Failed to pay, or make arrangements for paying Child Support Enforcement order, if established.
- Convicted of a drug-related felony after 7/1/1997.
- Members of the household have had documented substance abuse and failure to comply with a treatment plan.
- Participating in a strike.
- Under sanction in public assistance programs within Colorado or United States (failure to provide restitution, remedy or curative action).
- Applicant has quit a job, or has been terminated due to their own willful misconduct or refused employment without good cause.
- Household with liquid resources sufficient to cover current needs.
- Household would be unable to sustain financial self-sufficiency following diversion intervention.
- The county TANF allocation has been depleted.

Payment

- A County Diversion grant may not exceed $4000, once per twelve-month period per household; a family may not receive more than three diversion payments in a five-year time span. However, the Gunnison County HHS 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.

- A State Maximum grant amount is $2400.00 (HHS Director or designee approval may be sought for additional funds up to $4,000).

Payments will be issued on an 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 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 time-limited 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 Gunnison 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 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.

Gunnison 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 Gunnison County HHS 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 Gunnison County HHS Director or designee, and as budgets allow. No applicant is entitled to a diversion payment. When necessary, recoveries may be pursued.

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BOARD OF COUNTY COMMISSIONERS DATE

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DIRECTOR, HEALTH AND HUMAN SERVICES DATE

Gunnison County Department of Health and Human Services		
Title: **Policy # 3** **Nepotism/Conflict of Interest**	Original Date: 4/1/2016 Effective Date: 4/28/2017	Author: E. Holena Revision Date:
References: C.R.S. CDHS Volume 3.603.1		
Impact Areas: **TANF**		

BACKGROUND / PHILOSOPHY

The Gunnison County HHS Colorado Works program is designed to support all low-income families in their progression toward economic well-being. Gunnison County HHS is committed to providing assistance and services to all those who qualify, including those employed by Gunnison County, or former employees of other counties in Colorado. Gunnison County HHS 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 Gunnison County HHS 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 Gunnison County HHS 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 Gunnison County will be processed in a fair and equitable manner and according to the same guidelines as all other applications. No applicant will be 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 Gunnison County HHS 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 Gunnison County HHS 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 Gunnison County HHS director.

Gunnison County HHS relies upon the discretion and sound judgment of staff 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 Gunnison County HHS 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. Gunnison County HHS 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 Gunnison County HHS 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, these sensitive cases and 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 Gunnison County HHS to discourage and detect the occurrence of fraud, and include, but are not limited to the following:

- Gunnison County HHS 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 staff 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 Gunnison County HHS staff accept any gift, service, or preferential treatment from an applicant. Any such offer will be reported to his/her immediate supervisor. Staff throughout the department is encouraged to report any concerns of suspected fraud. (See Gunnison County Fraud Prevention Policy; #XXX-CWP)

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

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BOARD OF COUNTY COMMISSIONERS DATE

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DIRECTOR, HEALTH AND HUMAN SERVICES DATE

Gunnison County Department of Health and Human Services		
Title: **Policy # 4 Noncompliance/Closure**	Original Date: 4/1/2016	Author: E. Holena
	Effective Date: 4/28/2017	Revision Date:
References: C.R.S 26-2-711& 26-2-717(1)(b); C.R.C 3.626.4; 3.626.5; CDHS Volume 3, 3.626.1; 3.608.4; C.R.S 26-2-717; 3.626.4		
Impact Areas: **TANF**		

BACKGROUND

The Goal of Gunnison County HHS Colorado Works Program is to promote the long-term economic well-being of our community, through preparation for an attachment to employment for those who are able to work.

PURPOSE

The purpose of this policy is to identify the mechanism by which Gunnison County HHS imposes sanctions or closures for demonstrable evidence on all Colorado Works applicants or participants who fail to comply with the terms and conditions of his or her Colorado Works Individualized Plan(IP) without good cause.

DEFINITION

- Colorado Works Program: a state cash assistance federally regulated program.
- Cure: An act put in place by the Department, which corrects or relieves the non-compliance.
- Good Cause: Accepted (by the Department) and sufficient reason.
- Failure: Non-performance of what is requested or expected; omission.
- Individual Responsibility Contract (IRC): An agreement entered into by the participant and agency which documents the goals and activities of the participant, the type of assistance to be provided from the Agency, along with conditions, expectations, terms and time frames
- Sanction: action by the department to limit personal assistance or a funding penalty for non-compliance
- Strike: A strategy for recognition of failure to perform (as indicated in the IRC), accompanied with teaching/coaching for performance growth on the part of the participant. Intended to provide a "cure", so as to return to compliance, thus, foregoing a sanction. Three strikes require sanction action.
- Action Date: date established, in writing and notice to the participant, for a sanction, and action necessary to create a cure.

POLICY

Sanctions:

Sanctions accrue for life and are numbered in the order received and not re-numbered.). Refusal to participate in training, education or work as evidenced by an affirmative statement by the applicant or participant or demonstrable evidence may result in denial or termination of BCA grant in its entirety. Sanctions are recognized from other Counties but not other states. Gunnison County may sanction applicants or recipients of the Colorado Works Program for failure to comply with the terms of their IRC. Sanctions shall be applied as follows:

a. The **First Sanction**: will result in a 25% reduction in assistance funding for one month. If the sanction is cured by Notice-of-Action date, the case will progress with funding restored.
    - In the event of additional sanctions (on top of uncured sanctions), the participant shall be mailed a Notice-of Action and the sanction penalty will be advanced to the next level.
    - If a first sanction is cured on or before the last working day of the penalty month, the following month's grant will be calculated using 100% of the need standard.
b. The **Second Sanction**: shall be a 50% reduction for two months. The second sanction shall remain in place until the cause of the sanction is cured. Sanctions not cured by the notice of action date will automatically become a Third Sanction.
c. The **Third Sanction**: shall result in the termination of the funding provided and supportive services, and will remain in place until the cause of the sanction is cured, but not less than three months.
    - Third sanctions not cured by the end of the three months shall remain in effect until cured.
    - When the sanction is cured, a new assessment and IRC must be completed prior to receipt of further funding assistance.
    - Upon reaching the third career sanction, all subsequent sanctions shall have application as a Third Sanction Level for life.

Good Cause: For Not Imposing a Sanction

Gunnison County recognizes that there may be instances where a participant is unable to comply with the plan's terms. Good cause in Gunnison County HHS is defined as follows: unforeseen, unusual or unavoidable circumstances that would prevent most people from being able to engage in their plan as expected. Gunnison County HHS 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 Gunnison County HHS Director or designee

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

Serving and Curing a Sanction

All sanctions imposed by Gunnison County HHS must be served and cured by the individual. If that sanction is not otherwise cured, a new application following a sanction shall be considered the action for curing that sanction according to CDHS Volume 3.

Closure

Gunnison County HHS may deny, discontinue or terminate applicant/participant in Colorado Works BCA, or State or County Diversion for a minimum of one month and a maximum of three months if;

- There is a refusal to sign the individual Responsibility Contract
- There is a refusal to participate in one or more activities as agreed to in the IRC
- There is refuses to provide verification that the activities on the IRC have been completed.

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BOARD OF COUNTY COMMISSIONERS DATE

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DIRECTOR, HEALTH AND HUMAN SERVICES DATE

Gunnison County Department of Health and Human Services		
Title: **Policy # 10 HARDSHIP EXTENSION OPTION**	Original Date: 4/1/2016	Author: E. Holena
	Effective Date: 4/28/2017	Revision Date:
References: C.R.S. 26-2-716(5), CDHS Volume 3.606.6		
Impact Areas: **TANF**		

BACKGROUND

The Gunnison County HHS Colorado Works program is designed to support low-income families in their progression toward economic well-being. Gunnison County HHS 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 Gunnison County HHS Director or designee.

Eligibility

Gunnison County HHS 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 Gunnison County HHS

Gunnison County HHS will notify all participants who are approaching the 60-month time limit on Colorado Works assistance, starting at 55 months. Gunnison County HHS 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.

Gunnison County HHS will make a determination to grant or deny the extension within 30 days of receiving the customer's request for extension. Gunnison County HHS 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

Gunnison County HHS 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 document household circumstances determined by Gunnison County HHS

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:

BOARD OF COUNTY COMMISSIONERS DATE

DIRECTOR, HEALTH AND HUMAN SERVICES DATE

Gunnison County Department of Health and Human Services		
Title: **Policy # 11** **Domestic Violence and the Family Violence Options**	Original Date: 4/1/2016 Effective Date: 4/28/2017	Author: E. Holena Revision Date:
References: **C.R.S. 26-2-716** **CDHS Volume 3.602; 3.604.2**		
Impact Areas: **TANF**		

PURPOSE

Domestic Violence issues may prevent an individual from engaging with the standard components of the Colorado Works Program. Gunnison County HHS will conduct a 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 Gunnison County HHS procedure allows applicants and participants to voluntarily and confidentially self-identify as victims 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. Gunnison County HHS 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.

Gunnison County HHS provides referrals to appropriate domestic violence advocacy, counseling, and support services, to include the Project Hope, the Gunnison County Public Health agency, law enforcement, legal aid, and The Center for Mental Health. 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. Information is located in the Gunnison County HHS lobby and common areas, and includes, but is not limited to, material from local domestic violence and batterer's intervention service providers, criminal justice, victim advocate organizations, victim's compensation, and a domestic violence safety plan.

All Colorado Works applicants will be screened and identified 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.

Waiver

Gunnison County HHS 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. Gunnison County HHS 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 her or her family if she 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
5. Participants will be expected to become involved in work activities once the domestic violence counselor has determined the domestic violence issues have been sufficiently addressed.
6. The participant will maintain a current IRC

Training

Gunnison County staff HHS will receive state-sponsored training in recognizing, responding, 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 five years. Gunnison County HHS supplements state trainings that are offered with internal trainings provided in collaboration with the local and/or state domestic violence programs or agencies.

Gunnison County HHS 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. Gunnison County HHS will verify that each contractor's staff member as described in this paragraph has been trained.

Signed by:

BOARD OF COUNTY COMMISSIONERS DATE

DIRECTOR, HEALTH AND HUMAN SERVICES DATE

Gunnison County Department of Health and Human Services		
Title: **Policy # 14** **OTHER ASSISTANCE** **(Other than BCA or Diversion options)**	Original Date: 4/1/2016 Effective Date: 4/28/2017	Author: E. Holena Revision Date:
References: C.R.S. 26-2-706.6; 26-2-709; CDHS Volume 3.606.8; 3.609.961; 3.601;		
Impact Areas: **TANF**		

BACKGROUND/PHILOSOPHY

Gunnison County HHS, along with our workforce development partners, economic development community, community-based organizations, education and training providers, and other stakeholders, play a key role in supporting economic well-being for low-income individuals and families in our community. Gunnison County HHS 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, Gunnison County HHS provides broad assistance to eligible Colorado Works participants to help them establish economic security, enhance their quality of life, and promote employment goals.

PURPOSE

The purpose of this policy is to outline supports and services available through Gunnison County HHS. 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.

1. The assistance, service or activity must be consistent with the goals set forth in the IRC and must be stipulated in the participants IRC

2. The assistance must support the goal of self sufficiency

3. All assistance is recoverable in the case of fraud and are subject to child support collection.

4. Participants will be required to obtain financial support from other sources whenever possible.

Gunnison County HHS 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. Gunnison County HHS 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. Gunnison County HHS 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. Gunnison County HHS 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 Gunnison County HHS 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:*

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

- *Non-Custodial Parent Services*

  Gunnison County HHS 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 CW household in order to be eligible for services, but must be cooperating with child support services. Services are available as resources allow. Individual must be a parent of a minor child, live in Colorado and NOT live in the same household as the minor. Non-custodial parent is not eligible for BCA and any assistance cannot effect the custodial parents benefits.

Family Preservation

Gunnison County HHS assists Colorado Works/TANF eligible families experiencing "family issues" which threaten the family's ability to maintain a common home. Services include: The family's income and resources must be under $75,000, meet out-of-home placement criteria, have lived with a specified relative within the last six months, have a 5th degree or nearer of kinship to the specified caretaker or be psychological kin and be a U.S. citizen or have legal residential status in the U.S. Types of Family Preservation Services:

- Domestic violence services
- Non-medical substance abuse (inappropriate use of non-prescribed although legal medicines)
- Teen parent programs that provide services (counseling, casework, educational, employment) to pregnant and parenting teens
- Prevention and intervention program that provides assistance to needy families so children may be cared for in their own homes or in the home of relatives
- Counseling services
- Day treatment services – highly structured services that include education and therapy to the child and family
- Life Skills (services that teach personal and household management, effectively accessing community resources, parenting techniques, family conflict management, etc.)

Family Stabilization

Gunnison County HHS 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.

Incentive Payments

Gunnison County HHS may provide incentive payments for the following:

- Educational achievement within 30 days of completing a GED certification or high school diploma(up to $500)
- Vocational certificate(up to $500)
- College degree(up to $500)
- Completion of six full months of full time employment, 30 hours per/week, verified by employer(up to $500)
- Youth/child completion of three months of life skills classes(up to $50)
- A onetime payment match, up to $1000, for CW participants for closing on a home, higher education, business capitalization, transportation of other life –altering enhancement.
- Incentives will be defined in an IRC and pre-approved by HHS Director or designee.

Enhanced Family and Employment Supports

Gunnison County HHS 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, Gunnison County HHS 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.
- Utility Deposits;
- Housing Deposits
- Installation of Phone Services
- Emergency Assistance
- Shelter
- Child care;
- Food

Referrals

Gunnison County HHS 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 $4,000 per year in direct payments to clients and there is no limit on the cash value of support provided as services or via a vendor. The County H H S Director or designee has the discretion to override the amount of other assistance if a hardship exists. The HHS 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

Gunnison County HHS 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
- Child Support Application fee
- GED(if under age 20 and consistent with IRC goals)fees
- ABD(Adult Basic Education) fees
- ESL(English as a second language) fees

Gunnison County HHS will not allow supportive services to exceed $600/family per year.

Gunnison County HHS may allow payments for a special need to a parent or specified caretaker whose children is eligible and receiving Colorado Works cash assistance.

Assessed Need

An assessed need is defined as any need of a family receiving Gunnison County HHS 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 Gunnison County HHS Director or designee.

THIS SECTION OFFERS COUNTIES A TWO-GENERATIONAL SERVICE DELIVERY APPROACH

As a means to unify the work that we do in our community, Gunnison 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 Gunnison 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:

BOARD OF COUNTY COMMISSIONERS DATE

DIRECTOR, HEALTH AND HUMAN SERVICES DATE

Gunnison County Department of Health and Human Services		
Title: **Policy # 24** **Quality Assurance/Fraud Prevention**	Original Date: 4/1/2016 Effective Date: 4/28/2017	Author: E. Holena Revision Date:
References: C.R.S. 26-1-112; 26-1-118; 26-2-703 (17.5) CDHS Volume III 3.609 CDHS Fraud Prevention Manual		
Impact Areas: **TANF**		

BACKGROUND / PHILOSOPHY

The fundamental values of the Gunnison County HHS Colorado Works program include respecting the dignity and well-being of all people, promoting self-determination, honoring cultural diversity and acting with integrity, honesty, genuineness, and objectivity. Program staff considers these standards in ethical and professional decision making. It is the intent of Gunnison County HHS 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 Gunnison County HHS 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 Gunnison County HHS 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. Gunnison County HHS management leadership staff is responsible for the prevention and detection of fraud.

Risk Assessment
Each member of the leadership team will be familiar with the types of fraud that might occur within their area of responsibility. Leadership 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 Gunnison County HHS 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

Leadership, in conjunction with County Administration, will resolve irregularities concerning an employee's ethical or behavioral conduct.

Protocols | Other Criteria
(See Gunnison County Nepotism/Conflict of Interest Policy #3)

External Controls

Gunnison County HHS 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, Gunnison County HHS 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 Gunnison County HHS 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 Gunnison County HHS 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 HHS Director or designee for review
- HHS Director or designee review and approve the referral for investigation and forwards to the Fraud Investigator
- A record of all fraud referrals is maintained by the HHS Director or designee

Prudent Person Principle | Collateral Contact

When necessary and practical, Gunnison County HHS implements procedures for independent verification of customer information. We check on 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
- Confirming family membership and their identities
- Calling Employers
- Checking School records
- Contacting Car Dealers

Monitoring

Gunnison County HHS utilizes effective interviewing techniques throughout the life of a case to prevent and detect fraud. Additionally, HHS Director or designee 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 HHS Director or designee and the Administration review payment patterns and statistics. Reports reviewed may 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 HHS Director or designee and the Business Office use application logs and other internal tracking devices to cross reference specific case actions.

The Gunnison County HHS Quality Assurance Team uses Transaction Case Sampling to pull a percentage of case actions for each worker. HHS Director or designee 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

Gunnison County HHS staff are encouraged to report concerns to the Gunnison County HHS Fraud Investigator, who prepares a written report for HHS Director and Administration 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

The State Fraud Hotline is maintained to encourage the public to report suspected fraud 24 hours a day by telephone at 1-877-934-6361, by fax at 303-866-7332, or via –mail at colette.kreger@state.co.us.

Confidentiality

Gunnison County HHS 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 Gunnison County HHS 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:

BOARD OF COUNTY COMMISSIONERS DATE

DIRECTOR HEALTH AND HUMAN SERVICES DATE

Gunnison County Department of Health and Human Services		
Title: **Policy # 13** **Mental Health/Substance Abuse Screening and Treatment Program**	Original Date: 4/1/2016	Author: E. Holena
	Effective Date: 4/28/2017	Revision Date:
References: **C.R.S. 26-2-703** **CDHS Volume 3.606.8; 3.608.1; 3.608.2; 3.608.3**		
Impact Areas: **TANF**		

BACKGROUND / PHILOSOPHY

Gunnison County HHS 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.

Gunnison County HHS 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 or mental health needs as a hindrance to family self-sufficiency. Gunnison County HHS is committed to ensuring all Colorado Works participants who demonstrate a substance/alcohol abuse problem or mental health issue 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.

Gunnison County HHS has identified several criteria that may, in the absence of other explanation or good cause, point to a potential substance abuse or mental health problem. These criteria, if observed and documented, may warrant a referral to substance abuse/mental health screening by a local licensed professional counselor. At the point that substance abuse/mental health screening indicates the presence of a 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

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

Referral

A Gunnison County HHS staff member 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 3rd 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 HHS staff member and the participant. If included in the individualized plan, it should be messaged as a resource and support to the participant's overall goal. The IRC will include consideration of possible substance abuse and mental health struggles.

A participant has the right to refuse the referral. In the event that the referral is refused, the case will be staffed with the HHS Director or designee and Licensed Professional Counselor 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 appeal and sanctioning 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

Gunnison County HHS utilizes The Center for Mental Health for substance abuse/mental health screening by a LPC. The screening for substance abuse will be determined by a mental health professional completing the assessment. The counselor may also recommend the use of a

diagnostic urine test, contingent upon the results of the substance abuse assessment. 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 treatment provider. The conditions of the treatment plan may be included in the individualized plan, as appropriate, and Gunnison county may implement a hold (as determined by the HHS Director or designee) 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 treatment provider, with support as requested from the Gunnison County HHS Director or designee. 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.

When an assessment and rehabilitation plan is developed by a certified drug or alcohol treatment provider, a county department may require a participant to participate in a drug or alcohol abuse program. Such requirements must be written into a participant's IRC. The participants IRC may include, but is not limited to, the following:

- Random drug and alcohol testing.
- Drug or alcohol treatment or other rehabilitation activities.

If a participant does not follow his or her rehabilitation plan, tests positive on a random test, or refuses to participate in drug and alcohol testing, the county department may impose a sanction for not participating in a work activity.

Signed by:

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BOARD OF COUNTY COMMISSIONERS DATE

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DIRECTOR, HEALTH AND HUMAN SERVICES DATE