NORTH CAROLINA
TEMPORARY ASSISTANCE FOR NEEDY FAMILIES

STATE PLAN

P.L. 104-193

THE WORK FIRST PROGRAM

NORTH CAROLINA DEPARTMENT OF HEALTH AND HUMAN SERVICES
DIVISION OF SOCIAL SERVICES

Federal Fiscal Year (FFY) 2026 – FFY 2028

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WORK FIRST STATE PLAN
TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

INTRODUCTION

Vision and Mission

The North Carolina Department of Health and Human Services (NCDHHS) works to advance the health, safety, and well-being of all North Carolinians in collaboration with a wide array of partners and stakeholders. Much of this work involves managing the delivery of services to North Carolina's most vulnerable populations, including children, seniors, people with disabilities, and low-income individuals and families. NCDHHS touches the lives of millions of North Carolinians. Our goals reflect the wide range of programs administered and service populations.

Goals

NCDHHS believes health is affected by many factors beyond the medical care provided within the four walls of a hospital or clinic. While access to high-quality medical care is critical, research shows up to 80 percent of a person's health is determined by social and environmental factors and the behaviors that emerge as a result. A substantial body of research has established that having an unmet resource need, including experiencing food insecurity, housing instability, unmet transportation needs and interpersonal violence or toxic stress, can significantly and negatively impact health and well-being. It can also increase health care utilization and costs. To that end, NCDHHS has innovative programs to help connect people to needed resources to improve their health and wellbeing.

Departmental Goals for 2026-2028 are:

- Advance health equity by reducing disparities in opportunity and outcomes for historically marginalized populations within NCDHHS and across the state.
- Build an innovative, coordinated, and whole-person — physical, mental and social health — centered system that addresses both medical and non-medical drivers of health.
- Turn the tide on North Carolina's opioid and substance use crisis.
- Improve child and family well-being so all children have the opportunity to develop to their full potential and thrive.
- Support individuals with disabilities and older adults in leading safe, healthy and fulfilling lives.
- Achieve operational excellence by living our values — belonging, joy, people focused, proactive communication, stewardship, teamwork, and transparency.

These goals support our key work to:

- Buy health insurance for North Carolinians through our Medicaid program, including working with underserved communities to improve access to quality health care and reduce health disparities.
- Safeguard public health by protecting communities from communicable and chronic diseases, epidemics, and contaminated food/water.
- Protect the safety, security and well-being of children and vulnerable adults.
- Support individuals with disabilities and older adults in leading healthy and fulfilling lives.

- Promote family economic independence and self-sufficiency.
- Ensure high standards in the many health care facilities we operate or regulate.

North Carolina's TANF Program
North Carolina's Temporary Assistance for Needy Families (TANF) program, called Work First (WF), is one of the many programs that connect families to resources to support wellness and economic self-sufficiency. The program is based on the premise that parents have a responsibility to support themselves and their children.

The Work First program promotes a strengths-based, family-centered practice approach and shares in the mission of NCDHHS, in collaboration with its partners, to protect the health and safety of all North Carolinians and provide essential human services. NCDHHS is responsible for establishing, supervising and monitoring the Work First Program. At present, all services and benefits are delivered by county departments of social services in North Carolina's 100 counties.

Work First provides parents with short-term training and other services to help them become employed and move toward self-sufficiency. Other families, in which grandparents and relatives are caring for their relative children and those for whom they are legal guardian can receive services and support that prevent children from unnecessarily entering the foster care system. Of all TANF caseloads, grandparent and relative cases represent the highest caseloads in North Carolina.

Ultimately, North Carolina's goal is to help all families move to self-sufficiency. Many families can successfully leave the Work First program. Others, because of a hardship or disability, may have a harder time becoming self-sufficient. With those families, the role of the Work First program is to ensure that families receive all available benefits and services, such as Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), and services through the Division of Employment and Independence for People with Disabilities.

North Carolina's success at helping families move from Work First to work thus far has led to a broadened focus for the Work First program. No longer is the focus just on helping those families who receive Work First Cash Assistance obtain employment. North Carolina has added the flexibility and program structure for counties to provide former Work First families with job retention and child and family enrichment services designed to help ensure families experience long-term success. Further, since child support is critical to ensuring families' success, North Carolina allows counties to provide work-related services to non-custodial parents of Work First children.

In North Carolina, Work First emphasizes three goals for its Work First programs and has identified the following strategies:

Goal 1: Diversion
Support families in their efforts to maintain self-sufficiency through unexpected emergencies by providing short-term assistance and resources.

Strategy 1: Connect qualifying families with Benefit Diversion, Emergency Assistance, and/or Work First Services for Low-Income Families below or at 200% of the Federal Poverty Level
Strategy 2: Provide Employment Services for Non-Custodial Parents and other supportive services, if applicable. Strategy 3: Align resources and referral processes for unexpected emergencies (i.e. food, housing and other needs) with NCCARE360, the first statewide network that unites health care and human services organizations with a shared technology that enables a coordinated, community-oriented, person-centered approach for delivering care in North Carolina.
Goal 2: Achieving Sustainable Employment Families receiving cash assistance and Work First Family Services will obtain sustaining employment.
Strategy 1 Make work a mandatory program requirement with certain exceptions. Strategy 2 Limit how long a family can receive Work First Cash Assistance. Once the participants move into the work components of the program, they can continue to receive benefits for up to 24 months. In most cases, families who have reached the 24-month limit cannot receive Work First Cash Assistance for three years. Federal law sets a 60-month cumulative lifetime limit for receiving these benefits. Strategy 3 Require all adults who are included in the assistance payment to sign a Mutual Responsibility Agreement (MRA-B)/Outcome Plan.
Goal 3: Retaining Stable Employment Families who exit Work First will remain self-sufficient.

Strategy 1
Provide families with tools to save money and help to make sure they really are better off working than on Work First.

Strategy 2
Increase resource limits to ease the burden on low-income families pursuant to the change from Aid to Families with Dependent Children (AFDC) to Work First.

Strategy 3
Raise income eligibility limits for families who receive subsidized childcare to help families stay employed.

Strategy 4
Counties continue providing services, such as transportation, child care, financial counseling, short-term training, and child and family enrichment services to families whose income is at or below 200% of the federal poverty level.

Strategy 5
Families leaving Work First Cash Assistance for work may receive a Job Bonus payment for up to three months.

Ensuring optimal health and well-being of all North Carolinians is of the utmost concern. Toward that end, North Carolina has taken advantage of the opportunity offered by the TANF Block Grant to enhance our efforts in this area.

The NC TANF program provided services to approximately 44,565 cases with 85,224 participants during the previous state plan years. Adult recipients that remain on the caseload have multiple barriers that include but are not limited to medical and mental health issues, learning disabilities, lack of skills and work experience.

Federal Fiscal Year	Caseload Size	# of Participants
FFY 2022	**15,993**	**30,802**
FFY 2023	**15,631**	**30,374**
FFY 2024	**12,941**	**24,048**

Due to the changes in the work requirements associated with the program, low Work First benefit amounts, an increase in the job market in NC, and the Public Health Emergency, the Work First program has and continues to experience a continuous decline in individuals applying for assistance. The numbers remained steady from FFY 2022 to FFY 2023 due to the Public Health Emergency (PHE) flexibilities. These flexibilities allowed for the postponement of sanctions due to non-compliance with work requirements. When the Federal PHE was lifted the caseload trends continued to decline more rapidly.

In accordance with federal law, TANF funds, as well as Maintenance of Efforts (MOE) funds must meet one of four purposes. The four purposes under TANF are:

1. Assist needy families so that children may be cared for in their own homes or in the homes of relatives;
2. Reduce dependence of needy parents by promoting job preparation, work, and/or marriage;
3. Prevent or reduce the incidence of out-of-wedlock pregnancies; and
4. Encourage the formation and maintenance of two-parent families.

STATE WELFARE LEGISLATION

North Carolina General Statute 108A-27 provides for TANF program development by local county governments. The law refers to counties as Standard or Electing. Standard Counties operate the state's Work First program based on the policies written in the Work First Manual, while Electing counties have additional flexibility in program design that allows the county to determine the county's eligibility criteria and payment options. All counties have maximum flexibility in designing their employment programs to meet local needs. However, state law provides that Electing Counties, when combined, can contain no more than 15.5% of the state's Work First cases. The state and each Electing County's eligibility criteria are described later in this document. Throughout this plan, all references to "Electing counties" refer to those counties that have been approved as Electing.

STATEWIDE SOCIAL SERVICES REFORM AND WORK FIRST GOALS

Rylan's Law (Session Law 2017-41) is state legislation enacted in July 2017 which governs a legislatively required statewide reformation of North Carolina's social services programs. Recent studies indicated more accountability and oversight are needed for county departments of social services to produce better performance and outcomes. Effective March 1, 2020, Rylan's Law required the establishment of regional offices that provide closer, more direct, regional supervision and support to county departments of social services. Each county department of social services is part of a region of counties, and state-level DSS staff monitor and support these regions.
The Regional Support model means the state will provide regional supervision and support to the counties, which continues to locally administer social services. This approach does not supplant, abridge, or in any other way change the traditional role of the counties in administering social services.

Among other important changes, Rylan's Law requires all 100 county departments of social services to enter into an annual performance agreement with NCDHHS for all social services programs, excluding Medicaid. The agreement contains performance requirements and administrative responsibilities that were developed in consultation with county departments of social services. Ultimately, a data dashboard will be available to the public, so counties and citizens can easily access program data and performance.

Included in the performance metrics are goals for the Work First program. The goals and performance measures established below will reinforce efforts to improve the work

participation performance for North Carolina's Work First program. There are four performance measures for North Carolina's Work First program by which county departments of social services/agencies will be measured for compliance, pursuant to Rylan's Law:

1. **Meeting Federal Work Participation Rates for All Families**.
   Counties must ensure that at least 50% of all Work Eligible Individuals, as defined by federal rule, complete the required number of hours of federally countable work activities.

2. **Meeting Federal Work Participation Rates for Two-Parent Families**.
   Counties must ensure that at least 90% of all two-parent families with Work Eligible Individuals, as defined by federal rule, complete the required number of hours of federally countable work activities.

3. **Work First Applications**
   Counties will process 95% of Work First applications within 45 days of receipt.

4. **Work First Recertifications**
   Counties will process 95% of Work First recertifications no later than the last day of the current recertification period.

Rylan's Law provides North Carolina with a blueprint for collectively transforming North Carolina's social services system and speaks to the systemic changes that are needed to improve outcomes for families and children served by social services programs statewide. This reorganization includes our shifting from the current central state supervised locally administered system structure to a model of regional supervision which provides better support, technical assistance, and compliance monitoring of social services programs and services.

PROGRAM ADMINISTRATION

All services and benefits provided under the Work First program are delivered locally by county departments of social services/agencies in each of North Carolina's 100 counties. While Electing Counties have the option to offer alternative delivery options through community services providers, the county department of social services remains ultimately responsible for service delivery.

The state office is responsible for monitoring program compliance with state and federal laws and policies. The TANF State Plan has been reviewed and informed by stakeholders from a variety of state agencies and community partners to ensure compliance with State and Federal law and the goals of the Work First program. Agencies and state partners include: the Attorney General's Office, Department of Health and Human Services Division of Employment and Independence for People with Disabilities, Division of Child Development and Early Education, Division of Mental Health/Developmental Disabilities and Substance Use Services, North Carolina Families Accessing Services Through Technology (NC FAST), Child Support Services, Child Welfare, Fiscal Compliance

Monitors, Office of Economic Opportunity, and Performance Management, and Workforce Innovation and Opportunity Act (WIOA) funded agencies.

Electing Counties developed a county Work First block grant plan, including descriptions of strategies to achieve the measurable statewide outcome goals and performance measures as described in this plan. Electing County plans must involve a broad range of public, private, and nonprofit groups. Triennially, each Electing County must submit to the Department of Health and Human Services a local block grant plan that describes its proposal for the following:

- Work First Employment Services Program,
- Eligibility criteria for Work First Cash Assistance and other Work First Services,
- Emergency Assistance Program,
- Benefit Diversion Program,
- Provision of Work First Services to low-income families,
- Provision of Work First Services to former Work First recipients (Optional); and
- Provision of Work First Services to non-custodial parents of Work First children (Optional).

Electing Counties shall give the public an opportunity to review and comment on their local block grant plans before submitting to the Department. The county board of commissioners must appoint a committee of individuals to identify the needs of the population to be served and to review and assist in developing the county block grant plan in response to the needs. Membership of the committee must include but is not limited to representatives of the county Board of Social Services, the Board of the Local Management Entity/Managed Care Organization (LME-MCO) for Mental Health, Developmental Disabilities and Substance Abuse Services, the local Public Health Board, the local Schools Systems, the Business Community, the Board of County Commissioners and community-based organizations that are representative of the population to be served. In addition, faith-based organizations, service recipients, and other non-profits with experience in serving the population should be included. The Department provides all counties a model for use in developing an Electing County plan.

The Electing County block grant plan should include public and private resources that will help families move to self-sufficiency and should describe how services, such as childcare, transportation, housing, and skills training will be used. The plan must include the county's priorities for serving families who need childcare, based on the needs of the community and the availability of services and funding. Following review by the county social services board and other parties, the county commissioners must approve the county block grant plan before it is submitted to the Department.

Standard Work First counties must have the current information and/or detailed policy criteria on the items below placed on file at the county department/agency of social services by the beginning of each State Fiscal Year (SFY) for Work First program compliance:

A Memorandum of Agreement (MOA), contract, or protocol for collaboration with the below agencies:

- Workforce Solutions Division – NC Works

- Domestic Violence Agency
- Local Management Entity – Manage Care Organization
- Employment and Independence for People with Disabilities.

Local policy for the following services (guidelines specified, payment limits, etc.)

- Emergency Assistance
- Exemption from the work requirement for single parents of children under age one
- Services for low-income families at or below 200% or 150% of the Federal Poverty Level
- Services for non-custodial parents (service optional)
- Transportation

Electing Counties and Standard Counties have the same level of flexibility in designing their employment services programs to meet the federal participation rates and statewide Work First goals while addressing local circumstances. However, Electing Counties also have the opportunity to establish their own eligibility criteria and benefit levels.

In February 2025, seven (7) counties notified the Department of their desire to be designated as Electing Counties. The North Carolina Department of Health and Human Services, Division of Social Services, recommends that the following counties be designated as Electing Counties for the next three-year cycle: Beaufort, Caldwell, Catawba, Lenoir, Lincoln, Macon, and Wilson.

The Department has the responsibility to ensure that the Work First program in all counties complies with Federal and State law and the Work First goals. Under State Law, Electing Counties' caseloads combined cannot exceed 15.5% of the Work First caseload on September 1 of each year.

Since the caseloads of the counties requesting Electing status, in aggregate, are well below the 15.5% minimum, it was not necessary to rank the plans. The plans for Beaufort, Caldwell, Catawba, Lenoir, Lincoln, Macon, and Wilson counties will comply with applicable laws, rules, and regulations. All counties will be recommended to the General Assembly to be approved as an Electing County.

State law (NCGS 108A-27(e)) requires a county that desires to be re-designated to submit a request in writing to the Department at least six months prior to the effective date of the next State Plan. Funding for all counties is specified in State law. For Electing Counties, block grants are based on the percentage of each county's total AFDC and JOBS expenditures to statewide actual expenditures in 1995-96. For Work First Cash ~~A~~assistance, the resulting percentage is applied to the total budgeted funds for Work First Cash Assistance for each year. Electing Counties' eligibility criteria and processes are described In Appendix A. Many Electing Counties chose to follow some of the Standard County rules. When and if Electing County rules change to be the same as those of Standard Counties, no State Plan amendment will be submitted. If changes other than to conform to Standard County rules are made, an amended State Plan will be submitted. The responsibilities of the participant and the county are outlined in a

Mutual Responsibility Agreement (MRA-B)/Outcome Plan. The MRA-B/Outcome plan describes steps the family will take to become self-sufficient and the supportive services the county will provide.

Standard counties maintain required protocols and policies for services on file at the local county department of social services/agencies for State Fiscal Year (SFY) monitoring. All counties (Standard and Electing) are monitored to ensure compliance with program requirements.

The North Carolina Department of Health and Human Services, Division of Social Services has a Memorandum of Agreement (MOA) with the North Carolina Department of Commerce, Division of Workforce Solutions (DWS), Division of Mental Health, Developmental Disabilities and Substance Abuse Services (DMH/DD/SAS), and the Division of Employment and Independence for People with Disabilities. These agreements outline the services that will be provided by each agency to ensure that the needs of Work First participants are met.

The Division of Social Services requires the local county departments of social services/agencies to collaborate and coordinate services with the local NC Works Career Centers, the Division of Employment and Independence for People with Disabilities, area mental health providers, the Department of Public Instruction and the Head Start State Collaboration Office to provide services to assist Work First participants in obtaining employment and moving towards self-sufficiency. The Department encourages counties to partner with local resources and community agencies to assist Work First participants.

WORK FIRST ELIGIBILITY CRITERIA (UNLESS OTHERWISE NOTED)

Receipt of Work First is based on both non-financial and financial criteria. Electing Counties will follow Standard Counties' Work First Policy, except as indicated in the county specific plan.

NON-FINANCIAL ELIGIBILITY RULES

In addition to signing the MRA/Outcome Plan and work requirements, families must meet certain eligibility rules to receive Work First Cash Assistance. The basic eligibility rules are described below.

1. Children must be age 17 or younger at application. Children may receive through the month that they turn 18. Children aged 18 if in high school and expected to graduate by the month of their 19th birthday, can receive through the month they graduate from high school. Emancipated minor parents are considered adults and treated as such for Work First.

2. Children and adults who receive Supplemental Security Income (SSI) are not included as recipients in the Work First Cash Assistance case. If a parent is applying for Work First Cash Assistance, they only have one child, and that child receives SSI or adoption assistance, the parent may receive assistance with a payment for one person.

3. Parents, including biological, adoptive, or stepparents, must be included with their child(ren) in the Work First Cash Assistance case. All siblings, stepsiblings and half siblings living together must also be included in the case.

   Note: Siblings can be separated for non-parent caregiver applications. Non-parent caretakers have the option to include half siblings in the same household when unearned income is received for one of the half-siblings and is not intended for both siblings. If the non-parent caretaker chooses to include a half sibling(s) any unearned income for the half sibling(s) would be countable toward the assistance unit.

4. If kinship cannot be established for one child to the case head, the case head can receive assistance for the child(ren) for which kinship can be verified. This exception ONLY applies to non-parent care givers.

5. If both biological parents and adoptive parents are living in the same residence with a child, the adoptive parents must apply and be included, but the biological parents may not. Ineligible parents, such as undocumented immigrants living in the home cannot be included in the Work First Cash Assistance case.

6. If the child's parent and an individual who has legal custody or guardianship reside in the home with the child, only the individual who has day-to-day care of the child may apply for and receive Work First Cash Assistance for that child. The child's parent is included in the case, and child support must be pursued. The parent's income must be counted in this case. The parent must sign an MRA-B/Outcome Plan and is expected to complete the work participation requirements unless the parent meets one of the exemptions from the definition of Work Eligible Individuals.

7. Children for whom Foster Care and/or Adoption Assistance payments are being made are not included as participants.

8. Certain relatives, or a person with legal custody or legal guardianship, may apply for assistance for a child but may not be included in the payment.
   - These cases are child-only cases. The following relatives qualify to apply for a child: a blood or half-blood relative or adoptive relative limited to: brother, sister, grandparent, great-grandparent, great-great-grandparent,
   - uncle or aunt, great-uncle or aunt, great-great-uncle or aunt, nephew, niece, first cousin, and
   - spouses of anyone listed above even after the marriage has been terminated by death or divorce must have court ordered legal custody or legal guardianship of a child.

9. An adult or child cannot receive TANF Assistance in more than one case in North Carolina or any other state for the same month.

10. An individual can be the payee for one Work First Cash Assistance case at a time.

11. Undocumented immigrants are not eligible to receive Work First. North Carolina elects to aid all optional non-citizen populations allowable under federal law.

12. A family cap on assistance is in effect. This means a family's Work First Cash Assistance payment will not increase when a child is born ten (10) months after a month in which a parent received Work First Cash Assistance. There are some exceptions to the family cap rule, as follows:

    - A child who is the firstborn (including all children of a multiple birth) of a minor who is a dependent child.
    - A child who is conceived as a result of verifiable rape, sexual assault, or incest.
    - A child for whom parental custody has been legally transferred to someone other than the parent.
    - A child no longer able to live with their parent due to the parent's death, the parent's incapacity or disability, or the parent's incarceration or institutionalization if expected to last at least three months.
    - A child who is the only child in the family unit.

13. Minor parents (under age 18), unless emancipated, must meet special requirements:

    - They must stay in school to complete their high school education, or its equivalent. When a minor parent has not completed high school or has not received a GED, or is suspended or expelled from school, the minor parent must participate in an appropriate educational, training, or other work activity.
    - They must live with a parent or in another adult-supervised setting approved by the county director or the director's designee. Payments will be made to an adult as a protective payee, and not to the minor parent.

14. There is a five-year, lifetime limit on receipt of federal TANF assistance. Unless a hardship exemption is granted, a family is not eligible for Work First Cash Assistance if it contains an adult who has received Work First Cash Assistance in North Carolina and/or TANF assistance from another state for 60 cumulative months. The five-year lifetime time limit began in North Carolina on January 1, 1997.

A family may request a hardship exemption if the 60-month time limit has been exhausted. The county social services governing board, or its designee, will determine if an exemption will be granted based on guidelines established by the Department. The board or its designee must determine that:

- Both the family and the agency have made good faith efforts to resolve the problems causing the hardship during the 60 months of receipt of Work First Cash Assistance.
- Whether the participant is experiencing hardship as defined in the Work First Manual. Such hardships include, but are not limited to, situations where a family

member has been battered or subjected to extreme cruelty, where the family is dealing with a severe illness of children or parents, or where there is a combination of factors that together constitute a hardship.
- Whether the hardship condition is severe enough to prevent the parent from working on a regular basis.

Adults included in cases that have been granted hardship exemptions are expected to have an MRA-B Plan of Action/Outcome Plan in place that addresses each identified hardship criterion. Families are expected to work toward resolution of the problems as appropriate. Counties are expected to continue to provide necessary services to enable the family to work towards resolution of these issues. Exemptions can be granted for one to six months. At the end of the exemption period, the family may request another exemption.

Good cause considerations include, but are not limited to:

- A significant family crisis or change.
- Illness of the caretaker or child, including participation in substance abuse treatment or medical appointment.
- Civil leave, including jury duty, or a required court appearance.
- A significant change in the participant's work schedule by the employer.
- Disruption in childcare arrangements.
- Loss of transportation.

15. There is a state 60-month lifetime limit of assistance in North Carolina, for custodial parents who receive Work First Family Assistance for their children. Parents who receive Supplemental Security Income (SSI) are excluded from this policy.

16. In addition to the five-year federal lifetime limit, families who are active in North Carolina's Work First Employment Services are limited to 24 cumulative months of cash assistance, unless an extension as described below is granted. Families may re-apply for Work First after being off assistance for 36 months. All counties are required to review all Work First cases no later than three months prior to the end of the 24-month time limit.

The review is to:

- Ensure that time limits have been tracked correctly;
- Ensure the family is informed about other services;
- Provide an extension if the family qualifies; and
- Review the family status and assist them in identifying resources and support they need to maintain employment and family stability.

Up to 20% of Work First recipients may be enrolled, at least part-time, in a postsecondary education program. Recipients who are enrolled at least part time and who maintain a 2.5 grade point average (or its equivalent) shall have their two-year time limit suspended for up to three years.

Families may request an extension of the 24-month time limit at the end of the 24-month period or anytime following termination, including any time within the 36-month period of ineligibility. An extension may be requested verbally or in writing.

The county Board of Social Services, or their designee, will consider and decide on whether an extension will be granted. The board or its designee must determine:

- If the Work First participant substantially complied with the MRA-B/Outcome Plan, including considerations for any good cause exceptions.
- If the Work First participant, through no fault of his or her own, is unable to obtain or maintain employment that provides a basic level of subsistence. To determine this, the Board or its designee will compare the family's net monthly income to the maximum Work First payment for the family size. If the net monthly income is equal to the maximum Work First payment or greater, the family cannot receive an extension.
- If the participant is experiencing extenuating circumstances.

If an extension is granted, the Board or its designee must determine the length of the extension. Each extension must be a minimum of 1 month to a maximum of 6 months with no limit on the number of extensions (within the 60-month lifetime limit).

17. All Work First applicants (i.e., every member of a case) must have a social security number or apply for a Social Security number if they do not have one. Unless an individual has a Social Security, number or applies for one, that individual is not eligible for Work First.

18. Individuals who are temporarily absent from the home for fewer than 90 consecutive days may continue to be eligible for Work First. Individuals who are absent from the home for more than 90 consecutive days but fewer than 12 months may continue to be eligible for Work First, if they have good cause for the absence. Good cause includes absences for medical treatment, substance use treatment, and health care. For children, good cause also includes absences for educational requirements.

19. An adult must report to the case manager when a child is expected to be absent from the home for 90 consecutive days or longer. The adult must report the child's absence within five days of knowing the absence would exceed 90 consecutive days. Failure to report the absence within five days makes the adult ineligible for three months beginning the month after failing to make the report.

20. An individual who is convicted of misrepresenting their residence to receive Work First, Medicaid, SSI, or Food and Nutrition Services (FNS) in more than one state or more than one location in North Carolina is ineligible for Work First cash assistance for 10 years beginning on the date of conviction.

21. Incarcerated or institutionalized individuals are not eligible for Work First Cash Assistance.

22. A family must apply for Work First Cash Assistance in the county of their residence. However, if the recipient moves to another county, the Work First case will transfer to the new county of residence.

23. Work First Cash Assistance payment received solely because the timely notice (10-day notice) requirement prevents appropriate action to reduce or stop benefits is not considered an overpayment and does not have to be repaid.

24. Individuals who have been convicted of a Class H or I controlled substance felony in North Carolina may receive Work First Cash Assistance, or other services under the following conditions:

    - The individual may be eligible six months after release from custody; or
    - Six months after the date of conviction if the individual was never committed to custody;
    - And if there is no additional controlled substance felony offense during that time;
    - And the individual completes or continues appropriate substance use treatment as determined by the Local Management Entity. Individuals receiving Work First under these conditions are required to undergo substance use treatment as a condition of eligibility.

25. Families must legally reside in the state to receive assistance. Families that have moved to North Carolina after receiving cash assistance in another state will not be treated differently from current residents.

26. Work First Cash Assistance overpayments are recovered from the family, as allowed under state law or rule. This includes fraud, intentional program violations, and inadvertent errors by the family.

27. For Work First Cash Assistance cases, all changes are required to be reported by the family to the county within 10 calendar days of the date the change becomes known. This includes changes in income. All changes must be processed by the county within 30 calendar days of the report.

28. The certification period for Work First Services for families with income at or below 200 percent of the federal poverty level may be for a period of up to twelve months. Once certified, a family's eligibility does not need to be reviewed until the certification period ends.

29. All applicants for and recipients of Work First must provide verification of citizenship, qualified immigrant status, and identity.

30. Any family that includes an adult who has quit a job without good cause, or has been fired from a job with cause, is ineligible for Work First payments the month of the job quit or firing and the two months immediately following.

31. The following applicants/participants are subject to the substance use screening and testing requirement: single parents (biological, adoptive and step); both

parents (biological, adoptive and step) of a two-parent household; emancipated teen parent, as defined by Work First Manual Section 109, Age Rule for Children; any parent being added to an existing Work First case; parents who have been disqualified due to an Intentional Program Violation (IPV); parents who are ineligible due to fleeing felon and/or parole/probation violator status; parents with a Class H or I controlled substance felony conviction in North Carolina; and custodial parents who receive Work First Family Assistance for their children.

The substance use screening and testing requirement does not apply to: child only cases with a non-parent caretaker as the case head; dependent children; or Supplemental Security Income (SSI) recipients.

FINANCIAL RULES

1. Resources that can be readily converted to cash will be counted toward a $3,000 limit. “Readily converted” means the asset can be converted to cash within 5 business days.

2. All vehicles are excluded.

3. To calculate the payment, all income of Work First participants is counted, except the earnings of children, and the income of SSI recipients, Foster Care Assistance, Adoption Assistance, and the Earned Income Tax Credit, unless other law or regulation excludes an income type.

4. Countable income of all family members included in the case is counted. Income of parents who live in the household and are excluded from the case is counted as if they are included in the case. The exception is that no income of SSI recipients is counted.

5. For unearned income, the actual amount received is the amount counted in calculation of the payment.

6. For earned income, percentages are subtracted from the total monthly gross income as follows: 27.5% of gross earned income is excluded.

7. Job bonus is awarded to parents with new earnings for a maximum of or up to three (3) months.
    - The job bonus is offered to participants whose earned income terminates them from Work First Cash Assistance.
    - The job bonus applies to new earned income that begins after the application is approved for Work First. The job bonus is applied for employment that is expected to be permanent, and income terminates a participant from Work First Cash Assistance.
    - The job bonus can be applied once in a lifetime for each Work First family who becomes employed.

8. The Work First monthly payment is 50% of the difference between the total countable income and the need standard.

   The need standard is based on the number of eligible family members:

Number on Work First	1	2	3	4	5	6	7	8
Need Standard	$362	$472	$544	$594	$648	$698	$746	$772
Number on Work First	9	10	11	12	13	14	Each additional	
Need Standard	$812	$860	$896	$946	$992	$1,042	Add $50	

   - A family remains eligible if the result of the payment calculation is twenty-five dollars ($25.00) or more. Payments, including prorated payments for the month of application or termination, will not be made for less than twenty-five dollars.
   - For the month of application, Work First payments are prorated from the date of application with the date of application being day one. Otherwise, payments are made for the full month.

9. Proceeds from non-recurring lump sum payments are counted as a resource beginning the month after the month of receipt for ongoing cases. For pending applications, the non-recurring lump sum payment is counted as income in the month of receipt and as a resource beginning the month after the month of receipt.

10. When an adult Work First recipient or applicant is potentially eligible for other government benefits, such as Unemployment Insurance Benefits, the adult is required to apply for those benefits. If the adult fails to apply by the deadline established by the county or the adult refuses to apply, the family is not eligible for Work First.

11. Certain families, as defined in the Work First Manual, may be required to report income, participation hours, and other information to their county department of social services/agencies. Failure to submit information timely results in termination of Work First assistance. The reporting process will be defined in the Work First Manual.

APPLICATION PROCESS

County departments of social services/agencies are responsible for developing a benefit package as quickly as possible to help families move toward self-sufficiency. To expedite eligibility and payment determinations, applications may be submitted to the local Social/Human Services agency either in person, on-line, by mail, fax, drop-off, or by telephone. Applicants are not required to complete applications in the office nor have face-to-face interviews. Interviews may be conducted by telephone and a telephonic signature accepted. The Work First Cash Assistance Application and Review Documentation Workbook can be mailed to individuals who choose to apply for Work First Cash Assistance or short-term services and benefits. Upon receipt of the

application workbook, case managers must conduct a telephone interview with the applicant to complete the NC FAST Intelligent Evidence Gathering (IEG). Families may also access the Work First Cash Assistance Application and Review Documentation Workbook via the Electronic Pre-Assessment Screening Service (ePASS) portal. As appropriate, counties should offer families other services to enable them to remain off Work First Cash Assistance. Such services include Diversion Assistance (Benefit Diversion or Emergency Assistance), child support services, childcare, and job placement services. Diversion Assistance must be based on a family's specific crisis or episode of need and may not be used for ongoing or recurrent needs.

The time limit for processing applications for Work First Cash Assistance is 45 days. It is expected that most applications will be processed well within this time limit. In general, it is the applicant's responsibility to provide all the information, including verifications, needed to determine eligibility. Applicants may request assistance in obtaining information. The agency's obligation to assist the applicant is described in the Work First Policy Manual.

Applications may be denied within the 45-day processing period for any of the following reasons:

- The applicant fails to provide information needed to determine eligibility.
- The applicant refuses or fails to apply for unemployment benefits, when monetarily eligible, or refuses or fails to apply for other benefits, such as Social Security or veteran's benefits, for which he/she may be eligible.
- The agency is unable to locate the applicant.
- The applicant refuses or fails to apply for a required family member.
- The applicant refuses or fails to sign an MRA/Outcome Plan (either Core Requirements or Plan of Action/Outcome Plan, if required).
- The applicant fails, without good cause, to keep an appointment and has not contacted the agency concerning his/her application.
- Ineligibility has been verified including situations in which the applicant's statement results in ineligibility.

For any action or verification of information required of applicants, county departments will not deny an application without giving the applicant a written request for the action or verification, specifying a deadline that allows at least 10 calendar days in which to meet the requirement. The county must provide appropriate accommodations to assist applicants with limited language proficiency or disability in obtaining needed documentation.

Counties will not deny applications for the above reasons if good cause exists. Good cause is defined as:

- A significant family crisis or change including, but not limited to, the death of a spouse, parent, or child.
- Illness of the caretaker or child, including participation in substance abuse treatment or attendance at a medical appointment.
- Civil leave, including jury duty, or a required court appearance.

- Lack of childcare for parent and/or a minor parent in school, training, or other work activity.

An application for Work First Cash Assistance is valid for a 45-day period. If the application is denied before the 45th day, eligibility for Work First Cash Assistance can be established at any time within the 45-day period without requiring a new interview, assessment or Documentation Workbook. This is dependent on the county case manager having all information and documentation required to make the eligibility determination with the 45-day period.

ELIGIBILITY REVIEWS

Frequent contact with Work First families is critical in ensuring their success at moving to employment. Counties must review a family's progress on the terms of the MRA-B Plan of Action/Outcome Plan at least every 12 weeks. Families that do not participate in or allow the county to complete the periodic review will lose their Work First payment for at least one month. The family may re-apply for Work First, but eligibility can begin no earlier than the first of the month following the month of ineligibility. A face-to-face interview must be conducted, and eligibility re-determined at a minimum of every 12 months. A face-to-face interview can be in-person or any virtual platform which includes video capability and allows the worker to have a face-to-face conversation with the client. (This can include but is not limited to Zoom, Microsoft Teams, FaceTime, etc.) Case manager documentation should clearly outline the platform being used.

The Work First case manager must provide or arrange for appropriate accommodations for families with limited English proficiency or with disabilities to ensure reviews are conducted as scheduled.

CHILD-ONLY CASES

In alignment with North Carolina's 2020-2024 Child and Family Services Plan (CFSP), strategic priorities include ensuring safety, permanency and well-being needs are met for all children involved with child welfare services. This includes providing support to meet the diverse needs of relatives and kin who are caring for children in the child welfare system. Namely, by 2024, NC's CFSP aims to decrease the number of days it takes a child to exit foster care and increase the rate of permanent exits (reunification, adoption, guardianship, custody).[1] This goal reflects certain requirements identified in Rylan's Law, as well as the Family First Prevention Services Act which has an increased focused on family-based placements and supports for kinship caregivers. County departments of social services/agencies are encouraged to provide family enrichment services to child only cases and to conduct home visits. Children in child-only cases are likely to be "known" to the child welfare system. Often the child resides with a relative or kin rather than in the foster care system.

In terms of eligibility, child-only cases must be reviewed within six (6) months after the application has been approved and at least every 12 months thereafter. All reviews

[1] Also aligns with North Carolina's Early Childhood Action Plan (ECAP) which outlines a cohesive vision, sets benchmarks for impact by the year 2025, and establishes shared stakeholder accountability to achieve statewide goals

require a face-to-face interview. This face-to-face interaction may be in person or through a virtual platform which allows for video capability. Counties must evaluate and determine whether additional contact is needed for individual families. In child-only cases there are several provisions that make a family non-compliant. Some of these provisions include but are not limited to:

1) Child support non-cooperation,
2) Sanctions for failure to meet MRA provisions (child only);
    - Failure to have children who receive assistance appropriately immunized and meeting required health checks and;
    - Failure to ensure children who receive assistance stay in school.
    - Failure to report changes in situation within 10 days of knowing of the change; such as income and family composition, that affects the payment;
    - Failure to keep all scheduled appointments with the Work First case manager,
    - Failure to obtain immunizations and regular medical exams for children receiving WFCA;
    - Failure to report information,
    - Failure to comply with the Minor Parent Rules, which requires the Minor Parent to be enrolled in and regularly attend school and live with their parent, legal guardian, or other appropriate adult;
3) Failure to complete review or complete timely without good cause reasons

If the caretaker fails to provide appropriate care for the child, the case manager must evaluate the living arrangement. The purpose of the evaluation is to help determine if there are additional services needed by the caretaker to ensure compliance in the future. The goal is to keep the child in a safe and stable environment.

BENEFIT DIVERSION

Benefit Diversion is a cash payment alternative to traditional Work First Cash Assistance. Work First offers some families Benefit Diversion in lieu of Work First Cash Assistance. The cadre of services that may be provided include:

- A one-time payment of up to a maximum of three months of Work First Cash Assistance benefits;
- Referrals to child support, childcare assistance, and other community and agency resources.

Benefit Diversion is defined as nonrecurring short-term benefits that must meet the following criteria to be excluded as assistance:

- 1. Designed to deal with a specific crisis or episode of need;
- 2. Not intended to meet recurrent or ongoing needs; and
- 3. Will not extend beyond 3 months.

Benefit Diversion policy allows for:

- Families that receive Benefit Diversion do not have to repay the benefit amount received.
- Benefit Diversion can be received only once in a 12-month period and is not subject to Work First time limits.
- Recipients of Benefit Diversion are not required to participate in the Work First employment program.
- Eligible families are not considered Work First recipients and are not considered in calculating the State's participation rate.
- Families who have exhausted any Work First time limits are eligible for Benefit Diversion, provided all other eligibility criteria are met.

To be eligible for Benefit Diversion, families must meet the following eligibility requirements that apply to Work First:

1. Who may apply and be included in the family unit;
2. Income guidelines;
3. Resource limit;
4. Minor parent rules;
5. State/county residence;
6. Age rule for children;
7. Rule to have or apply for a Social Security number.
8. Citizenship/immigrant status;
9. Identity requirements; and
10. Kinship/living with rule.

No other Work First eligibility requirements apply to Benefit Diversion cases.

WORK FIRST BENEFITS PAYMENT POLICIES

All families with a parent included in the assistance payment are subject to the "Work First Benefits" payment process. A caretaker child-only case will receive their assistance payment at the beginning of the month.

Payments to families in Work First Benefits work eligible status are paid after performance. Assistance payments are received only after providing documentation showing they have complied with the requirements of their MRA-B/Outcome Plan including the Core Requirements and Plan of Action Requirements or show good cause for not complying.

When participants do not comply with their MRA-B/Outcome Plan during a month, their Work First Cash Assistance benefits will not be released for that month and they will not count in the Work Participation Rate. In addition, the month with no Work First Benefits will not count against the participant's 24- or 60-month time limits. If the parent has good cause for failing to meet their required hours of work activities or for not complying with other MRA-B/Outcome Plan requirements, their Work First Cash Assistance benefits will

be released and will be included in the Work Participation Rate. Good cause is defined as:

- A significant family crisis or change;
- Illness of the caretaker or child, including participation in substance abuse treatment or medical appointment;
- Civil leave, including jury duty, or a required court appearance.
- A significant change in the participant's work schedule by the employer.
- Disruption in childcare arrangements.
- Loss of transportation.

If a participant fails to meet their required hours of work activities or other MRA-B requirements, without good cause, the MRA-B/Outcome Plan serves as notification that their Work First case will be terminated. An adequate notice outlining the participant's rights to a hearing, is required to be sent to all households prior to termination of their case. When a case terminates, due to failure to comply with MRA-B requirements, it then becomes "Non-Public Assistance" for child support purposes, and the caretaker is eligible to receive child support payments processed through Child Support Services. For this reason, case managers are directed to promptly terminate cases when a Work First benefit payment is not issued. The child support payment for the following month (if they have one) will be sent directly to the participant. The family will have to reapply for Work First following termination for failure to meet their required hours of work activities or other MRA-B requirements. The family is eligible for any child support payment in a month a TANF benefit was not received.

ELECTRONIC FUNDS TRANSFER (EFT)

All Work First Cash Assistance payments are issued by electronic funds transfer (EFT). The two methods of issuance are direct deposit to a financial institution or electronic benefit transfer (EBT) card.

Direct deposit allows for the monthly Work First Cash Assistance payment to be electronically deposited to a personal savings or checking account of the case head. There may be fees associated with direct deposit that are imposed by the financial institution. These fees are the responsibility of the participant. The financial institution cannot impose charges for an account that it does not impose on its other customers for that same type of account. EBT is an electronic system that allows participants to access their benefits with a plastic card, similar to a bank card.

Work First households will receive the initial EBT card at no cost. If the family receives Food and Nutrition Services (FNS) benefits, the Work First payment may be issued on the same card. The first cash withdrawal transaction at an Automated Teller Machine (ATM) is free. There are not any fees for point-of-sale (POS) transactions.

Work First households that request a replacement EBT card shall be assessed a $2.50 fee. The fee shall be deducted from the account of the Work First household. The fee shall be refunded if the EBT card:

a) was lost in the mail or damaged by the vendor prior to receipt by the Work First household,
b) is being replaced due to a name change on card,
c) was lost due to a natural disaster such as a fire, flood, tornado or hurricane
d) was damaged by a retailer or vendor.

Fees associated with the use of the EBT card will be deducted from the balance of the card based on the available benefits in the account. If the recipient is receiving FNS benefits and Work First, the $2.50 card replacement fee will be deducted from the FNS allotment first. If there are not sufficient funds in the FNS EBT account or the recipient does not receive FNS, the replacement card fee will be deducted from the program account with funds available to cover the fee. If there are not sufficient funds in any single account, the EBT system will issue the card and deduct the funds at the next benefit issuance.

Federal law prohibits Work First recipients from using EBT cards "in any liquor store, any casino or gambling establishment, or retail establishment which provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for establishment." Recipients' Work First Cash Assistance payments may be terminated if used at restricted locations.

ELECTRONIC BENEFIT TRANSFER (EBT) MONITORING

In February 2019, The Division partnered with Fidelity Information Services (FIS) and implemented a Fraud Navigator Alert Detail Report that includes a Merchant Category Code (MCC) blocking that intercepts EBT transactions attempted at risky locations, which are identified by their MCCs.

FIS is currently blocking EBT transactions from any restricted locations: casinos, gambling casinos or gaming establishments, or any retail establishment which provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.

The Division submits an annual EBT Monitoring Report to the Administration for Children and Families (ACF) providing results from the Fraud Navigator Alert Detail Report.

SANCTIONS

Work First participants may be sanctioned for non-compliance with program requirements. There are four types of sanctions that are imposed when participants fail to comply with program requirements:

1. Non-cooperation with Child Support Services

   When a parent or other adult caretaker fails, without good cause, to cooperate with Child Support Services, the entire family could be ineligible for a Work First Cash Assistance payment. When Child Support Services notifies the case manager that a member of the WFCA unit has not cooperated without good cause, the case manager must issue a DSS-8146A requesting the participant to

cooperate with Child Support Services within 30 days to prevent the family from losing eligibility and case termination.

The case manager must enter a “Child Support Non-Compliance – Reduce WFCA Payment by 25%” sanction and NC FAST will issue an automated adequate notice notifying the participant the Work First payment will be reduced by 25% until compliance or termination. If at the end of the 30-day period the participant is still in noncompliance with Child Support Services, a Child Support non-cooperation sanction must be applied to the Work First Cash Assistance case. The sanction must be effective on the first day of the month following the month of the reduction. The participant must be provided with a minimum of 30 days to come into compliance but no more than 60 days.

2. Substance Use Treatment

   An applicant/participant that fails to comply with substance use treatment recommendations is ineligible for Work First Cash Assistance. If the applicant/participant is Work Eligible, they will continue to be Work Eligible and subject to Work First time clocks. The remaining household members can receive Work First Cash Assistance if otherwise eligible. The ineligible applicant/participant’s income and resources are included when calculating the amount of the Work First Cash Assistance payment. However, the eligible household member’s cash payment amount will be recalculated, excluding the ineligible member from the payment amount.

   The ineligible applicant/participant remains ineligible for Work First Cash Assistance until he/she complies with treatment.

3. MRA/Outcome Plan Non-compliance

   Failure to comply, without good cause, with the terms and conditions of the MRA/Outcome Plan will result in the entire family being ineligible for a Work First Cash Assistance payment for one month or until compliance, whichever is longer. The family remains eligible for Work First Services.

4. Intentional Program Violation (IPV)

   Individuals found to have committed an intentional program violation are disqualified from Work First Cash Assistance for 12 months for the first offense, 24 months for the second offense, and permanently for the third. The individual continues to be included in the family and continues to be considered a Work First participant for purposes of the work requirement and time limits. The family’s payment is recalculated with the individual is excluded from the needs.

Families in sanction status will be apprised of available community resources, including assistance through the county department of social services.

All agency staff are trained in indicators of child abuse and neglect and are expected to make reports as appropriate.

A family may avoid an MRA/Outcome Plan sanction if good cause for non-compliance exists. Good cause is defined as:

- A significant family crisis or change;
- Illness of the caretaker or child, including participation in substance abuse treatment or medical appointment,
- Civil leave, including jury duty, or a required court appearance.

PERSONAL RESPONSIBILITIES AND WORK REQUIREMENTS

The Work First program is based on the premise that all parents have a responsibility to support themselves and their children. Under Work First, the Core Mutual Responsibility Agreement (MRA) outlines in detail the obligations of parents, relative caretakers, or legal guardians in return for family assistance. All counties require families to sign the Core Mutual Responsibility Agreement.

For this section, there is a distinction between the requirements for families that include a “work eligible individual” and those families that do not. Drug felons, fleeing felons, and Supplemental Security Income (SSI) representative/protective payees are not excluded from the definition of work eligible individuals. The following individuals are exempt from the work requirement**:**

1. Adults receiving Work First Cash Assistance for a child only. (The adult is not included in the case.)
2. A non-participant relative, other than a parent, living with a child receiving assistance.
3. A non-qualified immigrant who is ineligible for Work First Cash Assistance or Work First Benefits due to immigration status. (Immigration status requires third party verification.)
4. A recipient of Supplemental Security Income (SSI.)
5. Single custodial parents with a child under 12 months of age.
6. Individuals with “child” family status (youth up to age 18 and not an emancipated minor payee or age 18, if in high school and expected to graduate from high school by the month of their 19th birthday). Emancipation occurs when a dependent child marries, becomes a member of the U.S. Armed Forces, or is declared emancipated by a court. An emancipated minor parent is treated as an adult applicant to qualify for and receive Work First Cash Assistance for themselves and their child.
7. A parent providing care for a disabled family member living in the home. Medical documentation to support the need for the parent to remain in the home is required from the Health Care Professional responsible for the medical care of the disabled family member.

MUTUAL RESPONSIBILITY AGREEMENT (MRA Plan of Action/ OUTCOME PLAN)

The first part of the MRA/Core Requirements applies to all families and describes the parent's or caretaker's responsibilities. A family is not eligible for Work First Cash Assistance unless the parent(s) or caretaker(s) signs the Core MRA. All Agreements must include provisions that the person:

- Contacts their Work First worker if a change occurs in their situation within ten (10) days of knowing of the change;
- Keeps all scheduled appointments with their Work First worker;
- Cooperate with Child Support Services for all children who receive assistance;
- Ensure that children who receive assistance get their immunizations and have regular checkups; and
- Ensure that school-aged children and minor parents who receive assistance live at home and attend school according to school attendance policy.
- Will not access the cash assistance on EBT card or use cash assistance in any liquor store, gambling or gaming establishment or any establishment that provides adult oriented entertainment.
- Acknowledge if they do not meet the requirements listed on the Core MRA Requirements, their Work First payment will stop.

A notice of appeal rights is sent to participants who fail to comply with the MRA requirements.
The second part of the MRA, The Plan of Action /Outcome Plan, is the Work Eligible parent's plan to meet the work requirements. This part:

1. Establishes employment goals for the parent(s);
2. Describes a plan for participating in work or work-related activities and the hours required in each activity; and
3. Describes the case management and supportive services that will be provided to help the family successfully meet the requirements of the MRA and move toward self-sufficiency. Supportive services may include reasonable accommodations for individuals with disabilities and language assistance for LEP populations.

All MRA Plan of Actions/Outcome Plans must include provisions that the person:

- Contact their Work First worker immediately if a change occurs that prevents them from completing the activities described on the MRA Plan of Action /Outcome Plan;
- Accept and keep any reasonable job offered. The participant will not quit a job, refuse an offer of employment or fail to follow up on job referrals without good cause;
- Submit verification of all activities completed each month by the fifth (5th) workday of the following month; and
- Acknowledge that failure to meet the requirements listed on the MRA Plan of Action/Outcome Plan will result in termination of benefits.

A family whose parent refuses to sign the MRA Plan of Action/Outcome Plan without good cause, is ineligible for Work First Cash Assistance. The WF payment is not issued for the month of non-compliance, the case terminates, and the family may re-apply at any time but may not be approved until the month following the missed payment.

EMPLOYMENT ASSISTANCE FOR WORK ELIGIBLE INDIVIDUALS

The NC Department of Commerce, Workforce Solutions Division is the presumptive, primary deliverer of job placement services for the Work First program and a critical partner with the NC Department of Health and Human Services. The Division operates over 80 local agencies across the state called NC Works Career Centers.

Registration for work with the NC Works Career Center is a prerequisite to participation in the Job Search component of Work First. All work eligible participants who are assessed as ready to engage in job search are required to register for work with NC Works Career Center. This requirement will be included on their MRA-B/Outcome Plan. Failure to register for work with the NC Works Career Center will result in termination of Work First benefits.

Counties also may contract with the local NC Works Career Centers for additional services such as job search, job placement, and referrals to community services. Modifications and/or accommodations may be necessary to assist individuals with registration and access to employment services.

WORK RESPONSIBILITIES

The State requires all Work First applicants to be assessed for employability at application for Work First Cash Assistance and again within three months of receiving assistance. If deemed work eligible, the Mutual Responsibility Agreement (MRA-B) Outcome Plan must be created and signed by the applicant within 5 days of the date of application. The MRA-B Outcome Plan includes realistic and obtainable goals and activities that will enable the family to participate in federal countable work activities and become economically self-sufficient.

Single parents of children less than 12 months of age are excluded from the participation rate calculation if they do not complete enough countable hours to be deemed engaged in work. This exclusion is for a cumulative total period of 12 months (lifetime exemption). In all counties, single parents with children under age six (6) who demonstrate that necessary child care is not available are not sanctioned. (See Child Care Section for required definitions.)

MRA-B /Outcome Plans are individualized based on an employability assessment. Often, an Outcome Plan will reflect fewer hours per week of activities than required to meet the Work Participation Rate. This may be due to a shortage of appropriate activities, a shortage of necessary support services, or other personal limitations of the participant. County Work First staff are responsible for balancing these limitations against the expectation of full-time participation and the requirement to meet the participation rates. All work eligible individuals are expected to strive and make progress

toward full-time participation. County Work First plans require frequent review because some plans may be short-term. The MRA-B /Outcome Plan may be updated or re-negotiated as often as appropriate.

When a work eligible individual has completed his/her first six (6) weeks in the Work First Employment Services program and remains unemployed or continues to exhibit signs and symptoms of substance abuse, domestic violence, or other barriers to self-sufficiency, then a more structured assessment is administered. The strategies and work requirements may need to be refined as the family begins to assume increased responsibility for its future independence. At a minimum, the MRA-B Outcome Plan should be updated every 12 weeks, although more frequent ongoing contact may be necessary, particularly for more challenging cases. If a participant does not have the skills or resources to accomplish completing a job application, researching job opportunities, demonstrating interview skills, or demonstrating appropriate interview demeanor, the case manager should refer the participant to community and agency resources.

Reassessment of cases is required three (3) or 12 months prior to termination. Case managers are required to complete a full assessment on families within specified months on the time clock. This full assessment should include an offer for a voluntary screening for disabilities. It is critical that the case manager assists families in establishing realistic goals in the context of time limits, work requirements, and available resources. Special attention must be paid to cases on the 24-month time limit during months 12, 18 and 24.

In the 18th month of participation, all cases on the 24-month time limit must be given a full assessment. This full assessment should include an offer for a voluntary screening for disabilities. The assessment may help identify a disability (for example, when there is a pattern of non-participation, behavioral cues, low test scores or poor performance in school or work assignments). If the participant declines the voluntary screening, the case record is to be documented to reflect the declination. In the 21st month of Work First participation, an automated notice is produced informing the family that their Work First payment will soon terminate and notifying the family of their right to appeal or request an extension. The notice also informs participants of benefits for which they may be eligible after their time limit expires such as Benefit Diversion, 200% and Emergency Assistance.

The state allows for the discretion of stopping the 24-month time clock for participants who have physical, mental, or emotional barriers that make full-time work unrealistic. Though the time clock may stop for such participants, they may continue working with Work First Employment Services. This encourages participants to work to the best of their ability while recognizing that limitations may make the 24-month time limit an unrealistic requirement.

Once Work First participants reach the 24-month timeclock limit a hardship extension can be granted if the county social services director or their designee determines that the participant, through no fault of their own, is unable to obtain or maintain employment that provides a net income of at least the State's maximum Work First payment of the family size. In such a situation, the participant may be granted up to a six-month extension to continue receiving employment services. Limitations not of a medical nature, such as criminal background, lack of child care, or the need to care for a medically exempt family

member may receive an exemption if sound documentation can be provided to substantiate the exemption. Participants requesting such exemptions will continue to receive Employment Services to assist the family with becoming self-sufficient.

The Administration for Children and Families (ACF) was instructed by the Deficit Reduction Act of 2005 to provide states with specific definitions of federally countable work activities. In February 2008, the Final Rules were issued with the following work activities:

1. Unsubsidized employment
2. Subsidized employment
3. Job Search
4. Job Readiness
5. On-the-Job Training
6. Work Experience
7. Community Service
8. Vocational Educational Training
9. GED/HS Completion for Teen Heads of Households
10. Job Skills Training
11. Education Directly Related to Employment
12. Satisfactory attendance at secondary school or in a course of study leading to a GED

Optional items and information specific to North Carolina are discussed below.

1. Custom Work Activities - Additional work activities that do not meet the federal definitions are also supported. A case manager and the family will use the results of the employability assessment to create the most likely and timely path to self-sufficiency.

2. Post-Secondary Education - Up to 20% of Work First participants may be enrolled, at least part-time, in a post-secondary education program. In Standard Counties, participants who are enrolled at least part time and who maintain a 2.5 grade point average (or its equivalent) shall have their two-year time limit suspended for up to three years.

WORK VERIFICATION REQUIREMENTS

In compliance with the Deficit Reduction Act of 2005 and the subsequent Final Rule, the state of North Carolina's Work Verification Plan was submitted and approved by ACF in September 2008 which includes the following:

1. Describes the services or programs the state includes under each work activity. (Services and programs must conform to the Federal definition of these activities.)

2. Describes how the State determines the number of countable hours of participation for each activity; including Community Service programs, found in pages 17 – 20.
3. Describes how the state verifies the actual hours of participation for each activity, including the procedures for obtaining and maintaining documentation of hours of participation.
4. Describes the methods of daily supervision for each unpaid work activity.

All county departments of social services/agencies must adhere to the requirements as outlined in the State's Work Verification Plan.

CHILD CARE DEFINITIONS

County departments of social services/agencies use the following guidelines to evaluate whether adequate child care is available for single parents with a child under age six (6). At each occurrence of non-compliance with the work requirement for a single parent caring for a child under age six (6), the county department of social services/agencies will document in the case record the reason for the parent's non-compliance. If the parent states that he/she is unable to participate because needed child care is not available, the county department of social services/agencies will evaluate each of the following criteria and document their findings in the case record. If the county finds that the parent's claim is valid, the sanction or loss of Work First benefits for non-compliance is not applied.

Appropriate Child Care

- Care in a regulated child care center or family child care home that has a license, or
- Care in a license exempt child care arrangement that meets the requirements of North Carolina's Subsidized Child Care Program.
- Child care options must have hours of operation which coincide with the work schedules of parents and meet any special needs of the individual children.

Reasonable Distance

- In evaluating "reasonable distance," counties consider the total time it takes for parents to travel one-way from home to the child care provider, then to work or work-related activity. Because of the differences in North Carolina's geography and highway/road systems, county departments of social services/agencies have maximum discretion to decide what is "reasonable" for individual families based on their resources (i.e. whether they have a vehicle in working order or families' resources available for transporting the family) and local transportation considerations.
- As a guideline, counties should consider that it might not be reasonable to require families receiving Work First to travel more than 80 minutes one-way to work and child care. Eighty minutes is approximately four times the average one-way commute time in North Carolina (not including stops at child care arrangements), based on data from the U.S. Census Bureau.

This does not preclude an exemption from the sanction or a loss of Work First benefits based on a shorter commute if the county considers the commute an obstacle to children's healthy development or the family's self-sufficiency goals.

Unsuitability of License Exempt Child Care

The unsuitability of a non-licensed child care arrangement is determined on a case-by-case basis. A license exempt child care provider may be considered "unsuitable" for a particular family if one of the following exists:

- The license exempt child care arrangement does not meet the requirements of North Carolina's Subsidized Child Care Program to receive subsidy payment.
- A parent does not want their child(ren) cared for by the non-licensed child care provider.

Affordable Child Care Arrangement

When a child care subsidy is available to the family, child care is considered affordable. If the child care provider charges parents the difference in the subsidy payment rate and the private paying rate and the parent cannot afford to pay the difference, that care does not meet the definition of affordable.

HEAD START/EARLY EDUCATION

The NCDHHS Division of Social Services continues to strengthen its' partnership with the NC Head Start-State Office. The goal of this collaboration is to:

a) increase the number of referrals of families participating in the Work First program to Head Start or Early Head Start programs for enrollment;
b) increase the number of referrals that Head Start or Early Head Start programs make to the local department of social services/agencies of families potentially eligible to receive Work First or other services;
c) develop an effective system of communication and information-sharing between Head Start and local departments of social services/agencies; and
d) provide joint training opportunities for Head Start staff and Work First staff that have similar job functions.

EMERGENCY ASSISTANCE (ALL COUNTIES)

Counties must use their Work First block grant funds to provide emergency assistance to families. Counties must define the eligibility criteria, including who is eligible and the types of emergencies that will be covered. This assistance is designed to assist with families' sporadic emergency needs, such as a utility cut-off or an eviction notice. Emergency assistance is not designed specifically to help families move to self-sufficiency, although, use of this assistance could help a family's progress.

Counties will comply with federal requirements. Emergency assistance does not trigger the 24- or 60-month time limit, nor will families receiving emergency assistance be required to participate in the Work First program. In addition, families who have exhausted their 24- or 60-month time limit are eligible for Emergency Assistance, provided all other eligibility criteria are met. These families are not included in calculating the State's participation rates.

At a minimum, counties must define and describe in their Emergency Assistance plans the following guidelines:

- The family must have a child who lives with a parent, relative caregiver, or nonrelative caregiver as defined in Work First policy, and who meets the age requirements for Work First.
- Total income must be at or below 200% of the federal poverty level.
- Family members must meet the same citizenship requirements and resource limits as for Work First.
- Countable income is the same as for Work First.

DISASTER OR PUBLIC HEALTH DECLARATIONS (ALL COUNTIES)

There is no waiver authority within TANF that would be triggered in the event of a disaster. When disaster or public health declarations are issued by the state and federal governments, the state may implement additional provisions for the use of Federal TANF funds and State MOE funds when warranted due to the severity of a natural disaster or other emergency declaration. The state may exercise the ability to expand services and broaden eligibility criteria for Work First Cash Assistance such as streamlining the application process, temporary suspension on; sanctions, terminations, Unemployment Insurance Benefits (UIB), collection of Program Integrity claims, temporary pass through of child support payments, granting good cause for activities that cannot be reasonably performed, providing on-line approaches to participation, increasing cash benefit levels for TANF participants~~,~~ and providing non-recurrent short-term benefits for families that meet the 200% FPL. The state may offer a wider range of services and benefits to address the crisis. Eligibility criteria may be altered to allow maximum flexibility to families and children negatively affected by the emergency. Additional options may include but are not limited to: relaxing or temporarily suspending residency requirements for families affected by a disaster when the family intends to return to the state within 90 days. The state may continue to provide assistance for a child who is temporarily absent from the home in which they reside for more than 90 days due to a disaster by granting good cause. The use of self-attestation for third party verifications will be accepted, with exception of citizenship and immigration documents. These two eligibility factors will continue to require third party verifications. However, county departments of human/social services would be encouraged to utilize all available resources to aid families affected by disasters in obtaining documents. The state may disregard all monies received by disaster victims under FEMA's Individuals and Household Program (IHP). In addition, during disaster or public health declarations, mandatory face-to-face interviews for Work First recertifications may be temporarily suspended and conducted via telephone or by the *ex parte* process.

During the COVID-19 emergency declaration, the state temporarily suspended Work First Cash Assistance terminations in relation to time clocks and paperwork or

procedural requirements as well as sanctions related to non-cooperation with child support and/or failure to perform work requirements. Active Work First Cash Assistance cases may not be terminated due to exhaustion of state or federal time clocks or failure to comply with paperwork or procedural requirements if all other eligibility requirements are met. Suspension of all sanctions against individuals and families currently in sanction status due to non-compliance with child support enforcement and/or failure to meet the work requirements will allow individuals to apply and receive benefits during the emergency declaration. Suspended sanctions could include non-compliance with child support services (i.e. appearing for interviews, hearings, and legal proceedings; supplying information or documentation; and submitting to genetic testing), substance use treatment, MRA/Outcome Plan terms and conditions. Applicants and participants with active Work First sanctions for failure to cooperate with child support and/or failure to meet the work requirements may be eligible to receive Work First Cash Assistance if all other eligibility requirements are met.

During previous emergency declarations, specifically COVID-19, the United States Department of Agriculture (USDA) has approved waivers which allow North Carolina to temporarily suspend collection of active Food and Nutrition Services (FNS) recoupments of overpayments, delay collection action on newly established FNS overpayments, and not consider payments on established FNS overpayments delayed due to this suspension to be delinquent. NCDHHS could explore the ability to include Work First Cash Assistance in a collaborative effort with FNS to streamline the functionality of the NC FAST case management system. If households choose to continue to make payments, the payment can be accepted and applied to their claim. Counties should inform households there is no penalty for not making payments. Although collection may be temporarily suspended during the emergency declaration, households will remain liable for their outstanding FNS and WF debts and the collection activity and delinquency determination will resume at the end of the waiver period.

Upon the state's decision to disregard unemployment insurance benefits (UIB), counties must not count UIB income received when eligibility for the UIB is directly related to unemployment, job loss or other qualifying status as a result of the emergency declaration; however, all other unemployment compensation payments received which are unrelated to the emergency declaration continue to be a countable source of income for TANF eligibility and benefit calculations.

In lieu of counting child support as unearned income for dependent child(ren) included in the Work First Cash Assistance budget unit, the state may opt to implement a temporary pass through of child support payments received to current TANF families. A temporary pass through will allow families to receive 100% or a portion of child support recouped by the state to offset TANF payments issued to the family.

The temporary suspensions furthermore allow for good cause exemption for not meeting eligibility requirements that are not available or attainable due to the onset of a natural disaster or other emergency situations. Case managers are encouraged to provide case management by phone or other virtual/electronic communication platforms. Counties should utilize online approaches for participants to engage in work activities virtually, such as online trainings, job search and work readiness to keep them engaged without needing to go to a training site. In the event the disaster or emergency declaration does not allow for the implementation of such approaches, a good cause exemption may be

applied to participants for work requirements. The state may automatically release Work First Cash Assistance payments to individuals/families currently in the pay after performance status when conditions require a statewide good cause exemption.

In response to the multiple needs of families during emergency declarations, the state may increase benefit levels for TANF participants. The increased benefits are assistance provided as a one-time payment for each eligible child in an active Work First Cash Assistance household. Children not included in the active Work First Cash Assistance case and children receiving Social Security Insurance (SSI) are excluded from the benefit calculation. The one-time payment may be issued in addition to the household's regular on-going TANF payment to provide additional support to the families in purchasing food and other household needs. The state may also increase Federal Poverty Level (FPL) guidelines statewide to provide non-recurrent short-term benefits to families meeting the 200% FPL.

All provisions implemented during emergency declarations shall be effective through the end of the month following the month in which the emergency declaration is lifted by the Federal or State government.

APPEALS PROCESS

For Standard Counties, the North Carolina Department of Health and Human Services has set uniform policies for determining eligibility, providing benefits, and ensuring fair and equitable treatment. Applicants or participants who choose to contest a decision adversely affecting their receipt of Work First Cash Assistance, or workers contending a breach of the non-displacement in work activity provision of federal law, may appeal in accordance with N.C.G.S. Sec. 108A-79 (N.C.G.S. 108A-79). Families are informed of their right to appeal and are provided with copies of Work First policy upon request. Electing Counties, as required by State law, have established a local appeals process that substantially complies with the appeals process outlined in N.C.G.S. Sec.108A-79 (N.C.G.S. 108A-79). Applicants and participants with disabilities and language interpretation/translation needs are provided with reasonable accommodation and services to assist them in participating in the appeals process if requested.

WORK FIRST SERVICES

It is important that families receive the services needed to assist them in moving toward self-sufficiency. All counties have maximum flexibility in deciding how they utilize their block grant funds to provide services to enable families to become and remain self-sufficient. The flexibility available to county departments of social services/agencies make it impossible to outline all the services that may be provided. Families may be provided with services that are not specifically prohibited by federal law or regulation. To the extent that Work First services are available, they may be provided to Work First participants at any time to support the scheduled activities of the MRA-B/Outcome Plan. In addition, support and family enrichment services may be provided for families whose income does not exceed 200% of the federal poverty level. Work-related services may also be provided to non-custodial parents of Work First participant children. The Electing County's Work First Plan describes how they will provide services.

Serving Non-Custodial Parents (Optional in All Counties)

Child support should be a primary income source for most Work First families and a way for former Work First families to remain off Work First. To enhance non-custodial parents' ability to pay child support, North Carolina allows counties to provide work related services for non-custodial parents of minor children who are Work First participants. The non-custodial parent's family income must be at or below 200% of the federal poverty level. The non-custodial parent is not considered a member of the custodial parents or caretaker's family. In addition to the ability to provide work-related services, Work First staff are encouraged to work with their local Child Support Services Office and judicial system to have child support orders modified to require the noncustodial parent's participation in employment activities, including registering for work in NCWorks online (http://www.ncworks.gov).

Serving Low Income Families

All counties are to provide in their county plan a variety of services for families with income at or below 200% of the federal poverty level that have a child who meets the same requirements as Work First Cash Assistance or Work First services.

Counties describe in their county plans how they will provide such services and what types of services they will provide. Services may be varied, including but not limited to, transportation, childcare, job retention bonuses, case management, follow-up services, mentoring programs, after-school learning programs, parenting programs, literacy programs, and post-employment skills training. Families who have exhausted their 24- or 60-month time limit are eligible for these services, provided all other eligibility criteria are met.

Child Care Services

Counties may provide subsidized childcare services by their Work First Block Grant funds. To qualify, families must be eligible for Work First Cash Assistance or for Work First Services as described in this plan. The child care services provided must comply with subsidized child care policies administered by the Division of Child Development and Early Education (DCDEE). All parents receiving child care subsidies have access to provider ratings and referral information to assist them with evaluating their child care arrangement.

All parents who have countable income are required to pay a rate of 10% of their monthly income for the cost of child care in accordance with the fee schedules administered by DCDEE.

Transportation Services

Counties are encouraged to develop local partnerships with other human services agencies, transit systems, businesses, workforce development agencies, faith-based community, civic organizations, etc., to develop and expand alternative transportation resources to meet the community's transportation needs. Issues such as

communication, coordination, mutual trust and respect, policies, marketing, funding resources and cost sharing are all part of the discussion process.

Some counties have developed car ownership programs through partnerships with other organizations. Vehicles donated from private citizens, businesses, and/or local governments are given to select Work First families. There are many variations of car ownership programs operating in North Carolina. Most programs require that the Work First participant pay at least a portion of the costs associated with liability insurance, repairs, taxes, and license and/or title fees. Some counties use Work First Block Grant Funds to purchase vehicles, make down payments, and assist with regular car payments or car repairs for Work First families.

ELDERCARE TRAINING

North Carolina is committed to strengthening support for an increasingly diverse aging population, along with their families and natural support systems. Workforce development and training, community education and engagement strategies will ensure such opportunities exist.

North Carolina ranks eighth nationwide in population of adults age 65 and older, and by 2025 one in five North Carolina residents will be older than 65. In light of the steady increase in the number of older adults in North Carolina, the Work First program will continue to provide assistance to work eligible individuals to train for, seek and maintain employment in the eldercare workforce. Work First Employment Services job skills training, work experience and employment retention services include training and employment for certified nursing assistants (CNAs), home health aides, and other occupations related to eldercare. In addition, case management services provide employment retention services for positions that include CNAs, home health aides and other occupations related to eldercare. Assistance may include tuition, payment of course fees, books, instructional materials, special equipment (i.e., lab coats, stethoscopes, etc.) and supportive services such as child care and transportation services.

Consistent with North Carolina's State Plan on Aging, the Division of Social Services will collaborate with the Division of Aging (DA) on eldercare issues and training needs. Local agencies are required to remain informed of local economic trends and provide employment services, including job skills training and job development, based on these trends.

HOMELESSNESS

Counties may use TANF and county funds to serve homeless families and families at risk of experiencing homelessness. These families must be TANF eligible or TANF participants. The services provided may include but are not limited to payments to cover basic needs, supportive services, and employment services. Counties may partner with local resources to coordinate and streamline services to prevent homelessness and promote self-sufficiency.

To better connect people with resources such as housing, and other basic needs, NCCARE360 coordinates the care network to electronically connect those with identified needs to community resources and allows for a feedback loop on the outcome of the connection. The Department recognized that people face a fragmented system of health and human services that can be hard to navigate. Providers often operate in siloes, are disconnected and have no meaningful way of coordinating services for local residents. NCCARE360 is a collaborative solution to this problem by providing a coordinated, community-oriented, person-centered approach to delivering care in North Carolina through a robust statewide resource directory that includes a call center with dedicated navigators, a data team verifying resources and text and chat capabilities. Other features include:

- A robust statewide resource directory powered by NC 211 which includes a call center with dedicated navigators, a data team verifying resources, and text and chat capabilities.
- A community repository powered by Expound to integrate multiple resource directories across the state and allow data sharing.
- A shared technology platform powered by Unite Us that enables health and human services providers to send and receive electronic referrals, seamlessly communicate in real-time, securely share client information, and track outcomes.
- A community engagement team powered by Unite Us working with community-based organizations, social service agencies, health systems, independent providers, community members and more to create a statewide coordinated care network.

VOTER REGISTRATION

The purpose of the National Voter Registration Act (NVRA) is to make more opportunities available for people to vote. The NVRA requires that individuals who are U.S. citizens and at least 16 years of age be offered the opportunity to register to vote or update a voter registration record at application, recertification or when reporting a change to their address.

The local county departments of social services/agencies must ensure voter registration forms are available to individuals during their visits. The voter registration questions are in the Work First Application Workbook (DSS-8228), Intelligent Evidence Gathering (IEG) and the one-page application in North Carolina's Families Accessing Services through Technology (NC FAST).

These individuals must be given a voter registration application form during their visit or mailed a form if the contact was by telephone or email. If the individual asks for assistance in completing the voter registration form, the case manager or another designated agency staff must help. Staff are required to provide the same level of assistance in completion of voter registration forms as offered in the completion of other agency/program forms. The agency must coordinate with their local Board of Elections office to ensure the agency maintains sufficient North Carolina voter registration materials to comply with the NVRA.

Agency staff do not determine the eligibility of any individual's right to register to vote. The county Board of Elections office makes that determination. Agency staff informs the individual the Board of Elections processes voters registration applications. Applicant and participant questions concerning voter registration must be directed to the local Board of Elections office.

Each applicant or participant must be informed that registering to vote or declining to register to vote will not affect their eligibility for services or benefits. No information relating to a declination to register vote may be used for purposes other than voter registration.

All completed voter registration applications must be submitted to the NC State Board of Elections no later than five business days after accepting the voter registration application. There must be interagency coordination to ensure the appropriate information is submitted to the NC State Board of Elections. This information includes the number of voter registration forms submitted and the number of remote transactions, the method of communication (telephone, email or U.S. Mail) and the transit method (U.S. Mail or email).

WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

North Carolina's TANF/Work First program is a required and active partner with WIOA.

- State and County TANF/Work First representatives participate in the planning of the Workforce Innovation and Opportunity Act (WIOA) "unified state plan" to identify career pathways for TANF/Work First participants. Career pathways include a combination of education, training, credentials, and career counseling that align with skill needs of state/local industries.
- Support services needed by TANF/Work First participants to participate in career pathways through WIOA and/or the NC Community College System are included. TANF/Work First participants are considered a "priority of service" for WIOA. State and County TANF/Work First representatives work collaboratively with WIOA and NCWorks Career Centers to develop and implement "priority of services" policies, referral procedures and disposition tracking.
- County TANF/Work First programs partner with local NCWorks Career Centers to provide TANF/Work First participants with an array of services and labor market information offered through one-stop career services centers. State and county TANF/Work First representatives assist WIOA, Division of Employment and Independence for People with Disabilities (EIPD) and NCWorks Career Centers in planning work-based training strategies for TANF/Work First participants with barriers to employment (including on-the-job training, subsidized employment and work experience programs).
- State and county TANF/Work First representatives' partner with state and local workforce development boards to engage employers and stakeholders to develop workforce strategies to ensure that TANF/Work First participants have access to emerging job opportunities with local businesses and industries.
- Increase cross-program (TANF/Work First & WIOA) knowledge and training among staff members.

- Coordination of services of TANF/Work First with Workforce Development partners through a formalized appraisal/referral process.
- Coordinate co-location of Work First staff in the NCWorks Career Centers to more directly connect Work First participants to employment activities. WIOA includes six core programs: Adult, Dislocated Worker, and Youth Formula Grants under Title I; Adult Education State Grants under Title II; Wagner-Peyser Employment Services under Title III; and Vocational Rehabilitation State Grants under Title IV.

Priority of Service Requirements

WIOA includes enhanced "priority of service" requirements to ensure recipients of public assistance and other hard-to-serve populations may access critical employment and training services through the NCWorks system. TANF programs should work with workforce development boards and NCWorks Career Centers' staff to develop and implement new priority of service policies; ensure that TANF participants are prioritized under such policies; and are offered services to meet their needs.

Work-Based Training

WIOA strengthens the workforce system's focus on work-based learning strategies for adults and youth with barriers to employment with on-the-job training, subsidized employment, and work experience. Some TANF agencies have recent experience with such programs for disadvantaged workers and can assist WIOA agencies in implementing them. State and local planning efforts should identify areas where WIOA and TANF resources can be aligned to support and expand these efforts.

Employer Engagement

Local workforce boards must engage employers to ensure that workforce investment activities meet the needs of businesses. Importantly, WIOA emphasizes the creation and use of industry or sector partnerships, which bring together stakeholders connected to local industries to develop short- and long-term workforce strategies in those industries. TANF programs should be included in local and regional sector partnerships to engage employers and ensure that TANF participants can access emerging job and training opportunities. TANF programs connect to the NC Works Business Services Representatives (BSR) to coordinate contact and activities with businesses, streamlining services and providing employers with access to a skilled workforce and potential financial incentives.

SUBSTANCE USE AND MENTAL HEALTH INITIATIVE

In response to growing demands for additional resources to meet the needs of individuals affected by substance use and mental health diagnoses, North Carolina has implemented a Behavioral Health Strategic Plan (BHSP), and an Opioid and Substance Use Action Plan. The BHSP[2] identifies two focus areas for strengthening the behavioral health system:

- Ensuring timely access to high-quality services, and
- Integrating behavioral health, I/DD, and physical health for children and adults.

The Opioid and Substance Use Action Plan focuses on four key areas to reduce the impact of the epidemic:

Center Equity and Lived Experiences

- Implement programs to reorient systems and increase cultural competence
- Acknowledge systems that disproportionately harm historically marginalized populations.

Prevention

- Cutting supply of inappropriate prescriptions and illicit opioids
- Supporting youth through targeted programs to reduce youth misuse of the drugs
- Improving maternal and prenatal care for women battling substance abuse

Reducing Harm

- Training systems and pharmacists to connect people to harm reduction services
- Making the naloxone kits more widely available to the most burdened communities

Connecting to Care

- Expanding access to treatment and recovery support
- Addressing the needs of justice-involved populations

North Carolina law (N.C.G.S. Sec. 108A-29.1) requires, if there is reasonable suspicion, substance use screening and drug testing (urine toxicology) for the illegal use of controlled substances for each Work First program adult applicant or participant is a condition of eligibility to receive assistance. Adult applicants or participants will complete a verbal substance use questionnaire designed to determine if an adult applicant or participant is at risk for alcohol and/or substance use disorders. When the results indicate illicit substance use, this meets criteria of ‘reasonable suspicion’ and a drug test is required within a period of time as specified by the Department. In order to establish eligibility to apply for Work First all applicants must have a background check completed by Work First to determine if there is a criminal conviction related to an illegal controlled substance within the past three years. If there is, this is the second criteria that meets reasonable suspicion’ and requires a toxicology test. The results of drug tests will remain confidential and will not be released to law enforcement. If an adult refuses to be screened initially for substance use, the adult is ineligible for Work First Cash Assistance. If otherwise eligible, the remaining household members can receive cash assistance.

When an applicant or participant is determined to be at risk for an alcohol use disorder, they are referred to a Qualified Professional in Substance Abuse (QPSA) for a substance use disorder assessment and referred to substance used disorder treatment if indicated.

Additionally, individuals who are engaged in or have completed substance use disorder treatment, are referred to the QPSA to have participation or completion confirmed, in part to support establishing eligibility for application or continued receipt of Work First program benefits. Individuals who are required to get drug testing to establish eligibility for Work First also have the opportunity to meet with a QPSA to gain information on substance use and substance use disorder treatment. A voluntary mental health screening is offered to all adult Work First applicants and participants as part of the interview process. If the screening indicates the adult is at risk for mental health issues, the applicant/participant may be referred to a Qualified Professional in Substance Abuse (QPSA) for further assessment.

If appropriate, a substance use or mental health referral is made through the Local Management Entity-Managed Care Organization (LME-MCO) to identify a provider for treatment, and then a treatment plan is developed. The QPSA serves as the care coordinator to track the adult's engagement in treatment. The QPSA and the Work First case manager jointly develop a plan for the family to ensure success. If the adult fails to comply with the treatment plan without good cause the adult is ineligible for Work First. The QPSA will assist the Work First case manager in determining good cause. The family's payment is recalculated with the adult excluded from the needs unit, and the payment is made to a protective payee.

Participants in treatment programs are expected to combine treatment with other appropriate work activities. The Opioid and Substance Use Action Plan increases the number of community-based recovery resources which include support groups, recovery centers and peer recovery coaches. The plan also reduces barriers to employment for those with criminal histories related to drug offenses via the use of therapeutic (mental health, recovery and veteran) courts. One strategy includes expanding employment support services for people with substance use disorders and increasing workplace policies and employment assistance programs that support people with substance use disorders. To reduce barriers to employment for those with criminal histories, another strategy includes supporting counties in adopting pre-arrest diversion programs and divert low-level offenders to community-based programs and services. For those with criminal histories, information will be provided on education options, career paths, and licensures that are available to people with different classes of convictions.

The Work First Program will seek new opportunities to align with efforts increasing access to behavioral health and substance use disorder treatment and resources. The Work First program will continue to collaborate with community, state, and federal partners in developing and providing trainings for county TANF/Work First staff to readily assist families with substance use resources and information.

FRAUD AND ABUSE

The North Carolina Department of Health and Human Services enforces standards and procedures to detect and prevent fraud and abuse by recipients and employees of the program. An administrative hearing process enables county departments of social services/agencies to identify cases of intentional program violations. All Standard Counties follow the hearing policy stated in Work First Policy. Electing County's Hearing policies are outlined in their county plan if different than policy in the Work First Manual.

Individuals found to have committed an intentional program violation are disqualified from Work First for 12 months for the first offense, 24 months for the second offense, and permanently for the third offense. The offender is not included when determining the benefit amount for the family, but the offender continues to be subject to time limits and work requirements. The overpayment is recovered by repayment or payment reduction.

OUT-OF-WEDLOCK BIRTHS

Teen Pregnancy Prevention Initiatives (TPPI), housed in the Division of Public Health, provide funding for local health departments, social services departments/agencies, school systems, and other community-based agencies to work with adolescents to prevent pregnancy among priority populations. These agencies use “best practice models” in group settings. Strategies may include abstinence and life-skills education, youth development, parent workshops, counseling and referral, community awareness efforts, and male involvement. Topics include decision-making and communication skills, information about specific areas of concern such as sexual coercion and statutory rape laws, and sexually transmitted infections (STIs) prevention.

STATUTORY RAPE

The North Carolina Department of Justice and the Office of the Attorney General primarily administer the programs addressing the problem of statutory rape for law enforcement officers, the education system, and relevant counseling organizations. The North Carolina Coalition Against Sexual Assault (NCCASA) is an inclusive, statewide alliance working to end sexual violence through education, advocacy, and legislation. NCCASA provides statewide training to the state’s 70+ rape crisis centers, law enforcement officials, and colleges and universities. Rape Crisis Centers across the state provide rape counseling services and resources to survivors of sexual violence on a day-to-day basis. NCCASA Provides information, referrals, and resources to individuals, rape crisis programs and other organizations, supports rape crisis programs and other individuals in their efforts to address sexual violence in their communities, and advocates for local rape crisis programs, creating networking opportunities for those involved in the rape crisis movement. On a statewide level, NCCASA works with legislators to strengthen North Carolina sexual assault statutes, advocate on behalf of survivors, coordinating Sexual Assault Response Teams across the state, and hosts the NC Campus Consortium to educate and support students and staff on NC campuses and their prevention efforts.
Public schools in North Carolina are required to have child sexual abuse training per Session Law 2019-245 Senate Bill 199. Local educational agencies control how they administer the training and with which resources. These trainings typically include statutory rape as being a form of child sexual abuse.

The Department recognizes the importance of education as a tool for the prevention of sexual violence, including statutory rape. Primary prevention focuses on developing strategies that target behaviors prior to victimization. The Teen Pregnancy Prevention Initiatives, housed in the Division of Public Health offers training to funded parenting programs regarding fatherhood involvement and legal issues, including child support.

The Department encourages the utilization of law enforcement, domestic violence, and other community-based agencies to educate teen fathers, non-custodial fathers, and young males. These institutional and community-based programs are ongoing and adhere to acknowledged philosophies and practices. The Teen Pregnancy Prevention Initiatives, housed in the Division of Public Health, offer training to fund parenting programs regarding fatherhood involvement and legal issues, including child support. The Department continually works to identify opportunities for appropriate program expansion while reviewing the efforts of other states.

FORMATION AND MAINTENANCE OF TWO-PARENT FAMILIES

Researchers have found many benefits for men, women, children, and their communities when adults are in healthy marriages. Some individuals are less likely to remain or end up in poverty and children and youth are less likely to become pregnant as teenagers when raised by parents in healthy marriages. The mission of the Healthy Marriages Initiative is to help couples that have chosen marriage for themselves gain greater access to marriage education services, on a voluntary basis, where they can acquire the skills and knowledge necessary to form and sustain a healthy marriage. Local community-based family resource centers provide a comprehensive array of family support programs, services and activities to encourage the formation and maintenance of two-parent families.

NATIVE AMERICAN TRIBAL PLAN

The State of North Carolina recognizes nine Native American tribes:

- Eastern Band of Cherokee (tribal reservation in the Mountains)
- Coharie (Sampson and Harnett counties)
- Lumbee (Robeson, Hoke, Cumberland, and Scotland counties)
- Haliwa-Saponi (Halifax, Warren, Nash, and Franklin counties)
- Sappony (Person County)
- Meherrin (Hertford, Bertie, Northampton, and Gates counties)
- Occaneechi Band of Saponi Nation (Alamance, Caswell, and Orange counties)
- Waccamaw-Siouan (Columbus and Bladen counties)
- Catawba Indian Nation (Cabarrus, Cleveland, Gaston, Mecklenburg, Rutherford, and Union counties)

The Eastern Band of Cherokee Indians, the Lumbee Tribe of North Carolina, and Catawba Indian Nation are recognized tribes by the Federal government. The Eastern Band of Cherokee Indians (EBCI) is approved to operate a Tribal TANF plan by the United States Department of Health and Human Services, Administration for Children and Families. The EBCI TANF Tribal plan provides for the intake, eligibility determination, cash assistance, employment services, and case management for tribal families. The EBCI continues to operate a pre-existing Native Employment Worker (NEW) program. North Carolina does not include these individuals in the state's federal work participation rate. The State will 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, with equitable

access to assistance under the state program funded under Title IV-A of the Social Security Act.

INDIVIDUAL DEVELOPMENT ACCOUNTS (IDA)

Counties may establish Individual Development Accounts (IDA), projects locally based on the counties' resources available. Counties' IDA projects must comply with federal and state regulations and with Section 404(h) of the Social Security Act.

CONFIDENTIALITY

The Division complies with State and federal laws/regulations as it pertains to confidential information. North Carolina General Statute 108A-80 states that it is unlawful for information to be released from a family's records, except for the purposes directly connected with the administration of programs of public assistance and social services. The law requires the Division to establish and enforce policies governing restrictions on the use and disclosure of any information concerning applicants and recipients of public assistance and comply with the applicable provisions of the Social Security Act concerning confidentiality.

FAMILY VIOLENCE OPTION

North Carolina has adopted the Family Violence Option. The state has developed standards and procedures to notify all Work First applicants and participants -about domestic violence to identify applicants and participants with a history of being a victim of domestic violence, sexual harassment, sexual assault, dating violence, and stalking There are also standards and procedures to ensure that case managers and other agency personnel responsible for administering the Work First program are trained in the following: the nature and dynamics of sexual harassment and domestic violence, sexual assault, and stalking and ensure the confidentiality of personal information and documentation related to applicants for assistance and their children who have provided notice about their experiences of sexual harassment, domestic violence, sexual assault, dating violence or stalking. These individuals are referred to counseling and supportive services (while maintaining their confidentiality) and may receive a temporary waiver from one or more Work First requirements if domestic violence is preventing them from meeting these requirements.

The Department has adopted the option to waive Work First requirements such as time limits, participation in work activities, child support cooperation, and family cap provisions in cases where there is good cause to show that compliance would make it more difficult for the participant to escape domestic violence. These waivers also apply to situations that would unfairly penalize someone who is, or has been, a victim of domestic violence. The length of waivers is determined on a case-by-case basis, but may not exceed six months at a time, and may be reevaluated as appropriate.

A substantial body of research has established that having an unmet resource need, including experiencing food insecurity, housing instability, unmet transportation needs

and interpersonal violence or toxic stress, can significantly and negatively impact health and well-being. It can also increase healthcare utilization and costs. With this in mind, North Carolina launched the Healthy Opportunities pilots as part of Medicaid Transformation. The pilots were an opportunity for payers, providers and community-based organizations to have the tools, infrastructure and financing to integrate non-medical services directly related to improved health outcomes into the delivery of care. We have strategically aligned with increased resources and opportunities to address interpersonal and family violence identified within the Health Opportunities pilots.

Pursuant to Section 402(a)(8) of the Social Security Act (42.U.S.C. 602(a)(8)); Consolidated Appropriations Act, 2022, section 703, as of March 15, 2023, the state has established, and is enforcing, standards and procedures to ensure that applicants and potential applicants for TANF are notified of assistance made available by the state to victims of sexual harassment and survivors of domestic violence, sexual assault, or stalking.

Pursuant to Section 402(a)(8) of the Social Security Act (42.U.S.C. 602(a)(8)); Consolidated Appropriations Act, 2022, section 703, as of March 15, 2023, the state has established, and is enforcing, standards and procedures to ensure that case managers and other agency personnel responsible for administering the TANF program are trained in: the nature and dynamics of sexual harassment and domestic violence, sexual assault, and stalking; state standards and procedures relating to the prevention of, and assistance for, individuals who are victims of sexual harassment or survivors of domestic violence, sexual assault, or stalking; and methods of ascertaining and ensuring the confidentiality of personal information and documentation related to applicants for assistance and their children who have provided notice about their experiences of sexual harassment, domestic violence, sexual assault, or stalking

LOCAL IMPLEMENTATION PLAN

Counties must develop a local plan addressing how the Option was implemented and operated. The protocol must include, at a minimum:

- The qualified family violence agencies/individuals within the community who will accept referrals for Work First participants.
- The individual/agency responsible for screening/assessment;
- The worker within the agency responsible for giving notifications;
- Crisis intervention procedures.

Each county must designate an individual(s) within DSS or get the assistance of an outside agency to conduct screenings and/or assessments. The individual conducting the assessment must be trained in family violence. Although there is no licensing procedure for family violence professionals, counties should carefully select the individuals/agencies who will be responsible for conducting in-depth assessments. In making the selection, consult with one (1) or more of the following: The Council for Women, the NC Coalition against Domestic Violence, or the local domestic violence program in the county or area recognized by the NC Council for Women.

TRAINING

The Work First team developed and published a Domestic Violence training. The training is maintained in the state's learning management system which is available to staff in all 100 counties. The state's continuous quality improvement specialist ensures all counties have received the material and trained their Work First staff through compliance monitoring. Counties will require all Work First staff and agencies who serve Work First participants to complete Family Violence training before speaking with participants about the Family Violence/Domestic Violence option. The training will include the following:

(1) the dynamics of domestic violence, sexual harassment, sexual assault and stalking;
(2) state procedures designed to prevent domestic violence and other forms of gender based violence and assist survivors; and
(3) procedures to ensure confidentiality of survivors' personal information.

The state will provide training through the NC Learning Gateway to all Work First case managers in the state and any other external agencies that work with TANF clients. Individuals/agencies with whom the county contracts for family violence services must also be trained on the Option and Work First. All Work First personnel including county staff, and Work First contract staff must complete Domestic Violence training annually and it is the counties responsibility to record county staff/contractor completion.

ENFORCEMENT (state level)
The state office will incorporate the new Family Violence requirement into existing Monitoring plans when conducting county reviews to ensure compliance with this requirement.

LOCAL DEMONSTRATIONS OR PILOT PROGRAMS

Counties may request approval from the Division of Social Services to design and operate demonstrations or pilot programs to investigate various ways of meeting the Work First program purposes and goals. These demonstrations will likely be in areas where the county lacks the authority to make specific program changes. Funding, in addition to the county's local block grant, may or may not be provided. There may be instances in which the state asks for proposals to address a specific topic. In other situations, counties may apply to the state to operate a pilot without an official request from the state.

TANF ELIGIBLE FAMILIES

To achieve the goals of Work First, North Carolina opts to take advantage of the flexibility allowed in the federal law and regulations. The Division defines several categories of eligible families. Eligible families include the following:

- Families that meet the income and resource requirements will be provided with Work First Cash Assistance or Benefit Diversion.
- Unwed parents, teenage parents or other high-risk populations in need of services to prevent or delay pregnancies without regard to family income.

- Pregnant women with Work First eligible children in the household and whose income is at or below 200% of the federal poverty level may receive support services.
- Non-custodial parents of Work First children where the non-custodial parent's family income does not exceed 200% of the federal poverty level may receive work-related services.
- Families with incomes that do not exceed 200% of the federal poverty guideline may receive all other services, including, but not limited to: Job retention and advancement services, employment services, support services, and preventive family services including child protective services and related child welfare activities.
- Any former Work First participant without regard to family income may receive limited follow-up and referral services.

In addition to serving the families described above, North Carolina provides services covered in North Carolina's approved State Plan as authorized by Parts A and F of Title IV of the Social Security Act in September 1995. Specifically, the services listed in the plan will be provided to families or children who are experiencing an emergency as defined in the plan and who do not have sufficient resources to alleviate the emergency. Services specifically include all child welfare services (e.g., child) protection, preventive family services, family preservation, and foster care and adoption services including foster care payments. Residential and emergency placement services can also be funded through this provision. Emergency assistance to needy families with children provides the following services under Citation 233.120:

A. Emergency Assistance to needy families with children under the age of 21 is provided in accordance with 45 CFR 233.120.

( ) No (Paragraphs B - D of this Section do not apply.)
(x) Yes, as specified below:

Emergency Assistance shall be provided to or on behalf of a needy child under the age of 21, the specified relative of the needy child, and any other member of the household in which he is living. The needy child under the age of 21 who is within the specified degree of relationship must be living with the specified relative or have lived with the specified relative within six months prior to the month in which Emergency Assistance is requested.

B. Families of migrant workers are covered.

( ) No.
(x) Yes, on a statewide basis.
( ) Yes, but only in the following areas of the State:

C. Other eligibility requirements are in effect.

( ) No.
(x) Yes, as specified below.

1. To be eligible for AFDC-Emergency Assistance, the applicant family must be without resources available to pay for what is needed to alleviate the emergency.

2. An individual who is an illegal alien is not eligible for AFDC-Emergency Assistance.

D. The kinds of emergency situations which are covered by this program and the kinds of assistance and services provided to meet the emergency situations are detailed below:

A. Kinds of emergencies covered**:**

1. A crisis resulting from a catastrophic illness
2. Substantial loss of shelter, food, clothing, or household furnishings due to fire, flood, or similar natural or man-made disaster, or a crime of violence
3. Emergency over which there was no control, and which left the family homeless or in immediate danger of eviction or foreclosure
4. A situation in which Emergency Assistance is necessary to avoid destitution of the needy child or to provide shelter for the child
5. Emergency which could lead to destitution and the destitution or need for a living arrangement did not arise because the child or a specified relative refused, without good cause, to accept employment or training for employment
6. Mass emergencies
7. Loss of a relative who has been responsible for support and/or care of one of his family members
8. Abuse, neglect, or dependency of children
9. Situation in which a child is at risk of removal from the home
10. Situation in which return to the home of a child who is currently separated from his family may create an emergency.

B. A heating or cooling-related emergency shall not be covered.

C. Kinds of assistance provided to meet emergency situations**:**

1. Cash assistance up to a maximum of $300 to alleviate the emergency by meeting basic needs for families whose total net income is at or below 110% of the current poverty level and total countable reserve is at or below $2,200. (Liquid assets must be at or below $300.) Basic needs include:

    (a) Temporary shelter, food, and clothing;
    (b) Transportation;
    (c) Home repairs such as repair of frozen pipes and plastic covering for windows;
    (d) Replacement or repair, when appropriate, of necessary appliances, household items, or furniture;
    (e) Outpatient medical services such as prescriptions, eyeglasses, and doctor visits if the expense is not covered by the Medicaid Program, or the individual needing the care is either not receiving or is ineligible for Medicaid; and
    (f) In-kind goods such as clothing, blankets, food.

2. In-Home Services including Assessment; Case Management/Service Planning and Coordination; Counseling and Treatment Services; Family Support/Family Preservation: Day Support Services: and Psycho-Educational Services.
3. Out-of-Home Services, including Residential Placement; Care and Treatment in a Family Setting; and Care and Treatment in a Group Setting.
4. Other Services, including Consultation and Education; Other Child Welfare Services; and, Transportation.

The above assistance must be authorized within a single 30-day period; no less than 12 months after the beginning of the family's last EA authorization period and are limited to a maximum duration of 364 days. Child Protective Services and related Child Welfare Services may be provided without regard to family income.

MARRIAGE EQUALITY

Same-sex marriage is constitutional in all states. The definition of “spouse,” includes a legally married individual regardless of gender.

USE OF FUNDS

Federal funds will be used in accordance with federal law and regulations. TANF funds will be used to meet the four purposes of TANF specified in the P.L. 104-193. Federal, state, and county TANF funds will be invested in activities to support achievement of specified outcome measures. These activities include but are not limited to enhanced training for state and local staff, automation, employer incentives, family planning services, substance use treatment, childcare, transportation, and other activities promoting self-sufficiency for families. In addition, federal TANF funds will be used for the services previously included in the AFDC-Emergency Assistance (EA) plan as specified in Appendix F.

Federal TANF funds may be spent as follows and in accordance with federal law and regulations.

- Work First Cash Assistance and Work First Services.
- Child care and early education.
- Supportive services, including, but not limited to work-related expenses and transportation. Educational activities intended to increase self-sufficiency, job training, and work, excluding any expenditure for public education in the state except expenditures that involve the provision of services or assistance to a member of an eligible family that is not generally available to other people.
- Administrative costs (which may not exceed 15% of the total funds spent for purposes under Title I of the federal block grant) are defined as costs associated with office directors, policy, fiscal, budget, personnel, purchasing, legal, clerical support, and direct, indirect, and allocated costs in support of these positions. Program supervisors, program clerical staff, and support costs of program staff are services costs rather than administrative costs. Staff time spent solely on determining financial eligibility, including evaluating assets, is counted as administrative.
- Case management staff and services, including outreach and follow-up activities.
- Expansion of child support efforts, including fatherhood initiatives, and training for eligible non-custodial parents. TANF funds or MOE will be used to fund a concentrated plan to increase the level of child support collections for eligible families.
- Cost-sharing requirements under the Job Access program under Section 3037 of the Transportation Equity Act for the 21st Century (P.L. 105-178).
- Automation
- Other uses that can be expected to enable families to care for children in their homes; promote job preparation, work, and marriage; that prevent or reduce the incidence of out-of-wedlock pregnancies; and encourage parents to marry and remain married.
- Any purpose for which the state was authorized to use funds received under Parts A and F of Title IV of the Social Security Act that were in effect on September 30, 1995. North Carolina will continue, as it has since 1995, to provide services (including child welfare services) to at-risk children as was approved in the Title IV-A State Plan as of September 30, 1995. A description of these services is in Appendix D.

If federal TANF funds are insufficient to cover cash assistance costs in the event of economic downturns, other federal, state, and county funds may be used to meet the costs of assisting needy families.
Counties can retain partial collections made on overpayments to recipients not due to agency error, including child care overpayments.

MAINTENANCE OF EFFORT

Under state law, both the counties and the state provide Maintenance of Effort (MOE) funds. County spending is generally through the county Work First Block Grant. This block grant contains an allocation of federal funds used for those services that meet the requirements for TANF expenditures. It also contains state and county funds that are used to meet the MOE requirements. Additional state funds for Maintenance of Effort are spent on such items as child care, state administrative costs, and automation.

In general, services provided under the first and second purposes of TANF, using TANF funds, and any of the purposes using Maintenance of Effort funds, may only be provided to families that are financially needy (i.e. with incomes at or below 200% of the federal poverty level). Services provided under the third and fourth purposes of TANF, using Maintenance of Efforts funds, may be provided without regard to income if the expenditures are pro-family. All other services provided for the purposes of using MOE funds are subject to incomes at or below 200% of the federal poverty level. Services may be provided to families or children who are experiencing an emergency as defined in the plan, and who do not have sufficient resources to alleviate the emergency.

MOE funds may be used for the activities listed below:

- Work First Cash Assistance.
- Work subsidies services which include on-the-job training (OJT) and Subsidized Employment. For OJT, each individual county based on the circumstances locally, will determine the amount of subsidy. On-the-job training may occur in any non-profit, for profit, public or private setting. Participation in this activity offers the opportunity to learn a new trade in a supportive environment, while transitioning into regular, unsubsidized employee status.
- Educational activities intended to increase self-sufficiency, job training, and work, excluding any expenditure for public education in the state except expenditures that involve the provision of services or assistance to a member of an eligible family that is not generally available to other people.
- Employment services directed toward Job Development and Placement, and Job Search and Readiness.
- Subsidized child care to assist with the cost of child care for families with incomes at or below 200% of the federal poverty level and who need child care in order to work.
- Information and case management services, including outreach and follow-up activities.
- Other Work First services activities which include the provision of mental health services and housing expenditures other than housing subsidies.

- Retention services provided to former Work First cash participants and eligible families who are not currently receiving Work First whose incomes are at or below 200% of Federal Poverty Level, including but not limited to, transportation, child care, job retention bonuses and services, child and family enrichment services, support services, employment services, and preventive family services, case management, follow-up, mentoring, after school learning programs, parenting programs, literacy programs, and post-employment skills training.
- Specialized services designed to allow Work First participants to participate in approved activities and to assist families in the transition from welfare to self-sufficiency.
- Supportive and preventive services, including, but not limited to: child and family enrichment services, work-related expenses, and transportation.
- Administrative costs (which may not exceed 15% of the total funds spent for purposes under Title I of the federal block grant) are defined as costs associated with office directors, policy, fiscal, budget, personnel, purchasing, legal, clerical support, and direct, indirect, and allocated costs in support of these positions. Program supervisors, program clerical staff, and support costs of program staff are services costs rather than administrative costs. The staff time spent solely on determining financial eligibility, including evaluating assets, is counted as administrative.
- Automating the provisions of the law.
- Child Welfare Services to encompass a broad range of services including family preservation and support, Child Protective Services, Foster Care and Adoption Services, counseling and individual and family adjustment services, in-home aide services, intake and case management, housing improvement, and other services.
- Emergency services to assist with families' sporadic emergency needs such as a utility cut-off notice or an eviction notice.
- Non-assistance housing subsidy services that can help families meet their goals for self-sufficiency and allow children to be cared for in their own homes or in the homes of relatives.
- Participation services such as adult care, Work Experience, and other expenses necessary for participation in the Work First program.
- Other uses that reasonably can be expected to enable families to care for children in their homes; that promote job preparation, work, and marriage; that prevent or reduce the incidence of out-of-wedlock pregnancies; and that encourage parents to marry and remain married.
- Programs for at-risk youth that provide after school programming, mentorship, remediation, alternative education, dropout prevention, and other supportive services.
- North Carolina pre-Kindergarten, early education, and other school readiness programs intended to ensure youth are prepared to enter school.

IMPLEMENTATION

North Carolina will phase in implementation, based on resources, training needed, and automation abilities. Any changes requiring modifications to the existing Client Services Data Warehouse (CSDW), Services Information System (SIS) or North Carolina Families Accessing Services through Technology (NC FAST) that support the Work First program

will be delayed until the modifications can be implemented in the systems. Existing policies remain in effect until the required automation changes can be made effective or changes not requiring automation can be put into place.

AMERICANS WITH DISABILITIES ACT REQUIREMENTS (ALL COUNTIES)

In accordance with federal law and U.S. Department of Health and Human Services policy, county departments of social services/agencies are prohibited from discriminating against any person based on race, color, national origin, sex, age, religion, or disability in admission, treatment or participation in its programs, services activities, or in employment. All counties are required to have policies and practices in compliance with American with Disabilities Act (ADA) as well as the provision of interpreter services for its citizens who require such accommodations. Counties are asked to provide a detailed discussion on how the county complies with ADA as well as how they accommodate requests for interpreter services.

To ensure effective communication and meaningful access to programs and services, individuals with disabilities will be notified of the availability of services at no cost. Such services may include but are not limited to: sign language interpretation and foreign language interpretation services.

Documents notifying applicants and program participants of adverse actions will be communicated in plain language and provided in the applicant's primary language or will include information on how to have the documents interpreted free of charge.

The Division will track statistical information as it relates to individuals with disabilities.

The Personal Responsibility and Work Opportunity Reconciliation Act requires Title II of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 (Section 504) apply to TANF programs. The ADA (42 USC Section 12101 *et seq*.; 28 CFR Part 35) applies to counties and other local governments administering all or part of the TANF program, and Section 504 (29 USC Section 794; 45 CFR Part 84) applies to entities that receive federal funding, either directly or indirectly, through a grant, contract, or subcontract. The two significant elements of Section 504 and Title II of the ADA are:

- Individualized treatment; and
- Effective and meaningful opportunity.

Individualized treatment means that individuals with disabilities should be treated on a case-by-case basis and not on stereotypes and generalizations. Further, individuals with disabilities must be afforded the opportunity to benefit from Work First in the same manner as those individuals who do not have disabilities. Exempting individuals with disabilities from work requirements denies these individuals access to services and may result in discrimination.

Section 504 and ADA requires that agencies:

- Ensure equal access to employment programs for qualified individuals with disabilities through the provision of appropriate services;
- Adopt methods of administration, which do not discriminate against and ensure equal access and opportunity to qualified individuals with disabilities; and
- Modify policies, practices, and procedures to provide equal access which allows qualified individuals with disabilities to participate in and benefit from employment programs, unless doing so would fundamentally change the program or cause an undue hardship.

Qualified individuals with disabilities must be provided reasonable accommodation so they have an opportunity to participate in and benefit from services and programs that are as effective and meaningful as those available to individuals without disabilities. A reasonable accommodation is any reasonable change in the way the Work First program administers the program, or the way it requires individuals or families to participate. Exempting the Work First participant for "good cause" when they are unable to meet work requirements because they have a disability or are caring for a family member with a disability, is not an alternative to evaluating the need for accommodation.
To ensure that individuals with disabilities have equal access to employment programs, the Work First staff must screen and assess all applicants and participants to determine the participant's specific abilities and limitations. Screenings and assessments will occur periodically to address potential program participation barriers. Individuals may be referred to the Division of Employment and Independence for People with Disabilities for determination of their eligibility for such services, or to other qualified professionals for a comprehensive assessment.

Any applicant or participant who meets the ADA's definition of disabled, and those individuals caring for family members who are disabled, should be provided reasonable accommodation, if needed. Reasonable accommodation may include but are not limited to:

- Part-time work activities;
- Reasonable accommodation for work activities;
- Job restructuring, including part-time or modified work schedules, modification of equipment and examinations, provision of qualified readers, interpreters, or job coaches;
- Additional assistance or increased supervision in work activities;
- Assistance with application for benefits, including a notification process for those with learning disabilities; and
- Specialized child care for a child with a disability.

Accommodation will be considered when scheduling appointments and requesting that the individual obtain and provide documents for verification purposes.

An individual who has requested an accommodation and believes they have not been adequately accommodated, must notify the Work First case manager verbally or in writing. Within 7 workdays of the receipt of notification, the county should have a meeting

to include the individual and/or his/her representative and appropriate staff. The county has 14 workdays from the date of the meeting to respond to the request. The county must notify the individual of the decision in writing within 14 workdays from date of the meeting.

The county departments of social services/agencies are required to inform the applicant or participant that disclosure of a disability is voluntary. This includes screening for a disability, including learning disabilities and mental health disorders. Nonetheless, counties must inquire about an individual's health related limitations to determine the appropriate work assignments. The participant does not have to provide the information. Individuals, who believe they have been discriminated against based on disability (including failure to provide reasonable accommodation), race, national origin (including the failure to provide access to services to people with limited English proficiency) may file a complaint with the Office of Civil Rights (OCR) at the U.S. Department of Health and Human Services.

There are times when identification and treatment of a disability are necessary for program administration. Under these circumstances, a participant may be required to participate in efforts to evaluate a suspected disability and participate in necessary treatment. Those circumstances may include:

A. If a participant reports they are unable to work or have limited work capacity the individual may be required to substantiate their statements by providing medical documentation, and/or participating in screenings and evaluations as agreed on the MRA/Outcome Plan. Failure to comply may result in a sanction of benefits. All participants are given an opportunity to provide any required medical documentation before a sanction of their benefits occurs.
B. If a participant has demonstrated an inability to successfully participate in work activities, or employment and the case manager has reason to believe this is due to a disability or work limitation, the county may require the participant to be screened or evaluated to establish the necessary services to support the participant in achieving success in the Work First program. If the screening or evaluation determines that the participant requires treatment, the participant may be required to participate in the necessary treatment as a condition of the MRA/Outcome Plan.

Individuals with confirmed disabilities must be provided with reasonable accommodation and services to support their participation in employment and work related activities.

TITLE VI REQUIREMENTS (ALL COUNTIES)

In accordance with federal law and U.S. Department of Health and Human Services policy, county departments of social services/agencies are prohibited from discriminating against any person based on race, color, national origin, sex, age, religion, political affiliation or disability in admission, treatment or participation in its programs, services activities, or in employment. All counties are required to establish policies and practices in compliance with Title VI of the Social Security Act, as well as the provision of interpreter services for its citizens that require such accommodation.

To ensure equal access to employment programs, the Work First staff must screen and assess all applicants and participants to determine the individual's specific abilities and limitations. Screenings and assessments will occur periodically to address potential program participation barriers.

To ensure effective communication and meaningful access to programs and services, individuals with disabilities or limited English proficiency (LEP) will be notified of the availability of services at no cost. Such services may include but are not limited to sign language interpretation and foreign language interpretation services.

Documents notifying applicants and program participants of adverse actions will be communicated in plain language and provided in the applicant's primary language or provided with information on how to have the documents interpreted free of charge.

All members included in the Work First application must be U.S. citizens or qualified or otherwise eligible immigrants.

If an applicant or participant requires an interpreter, the county departments of social services/agencies must provide such services for the applicant or participant. Generally, this service is provided during the initial contact with the applicant as well as during ongoing contacts.

All rules of confidentiality must be applied regarding citizenship/immigrant status. It is a breach of confidentiality to discuss an individual's citizenship/immigrant status with employers, landlords, etc.

CERTIFICATIONS REQUIRED OF THE GOVERNOR

As Governor of the State of North Carolina, I hereby certify that during each fiscal year to which this State plan is applicable:

- This program will be known as the Work First program.
- The provisions described in this TANF State Plan will be carried out in accordance with federal and state law.
- The State will operate a Child Support Services Program in accordance with the State plan approved under Title IV-D of the Social Security Act.
- The State will operate a Foster Care and Adoption Assistance program in accordance with the State plan approved under Title IV-E of the Social Security Act.
- The State will take any actions that are necessary to ensure that children receiving assistance under Title IV-E of the Social Security Act are eligible for medical assistance under Title XIX of the Social Security Act.
- The North Carolina Department of Health and Human Services is the agency responsible for supervising the program and administering program funds.
- Local governments and private organizations have been consulted regarding the plan and design of welfare services in the state, and they have been given forty-five (45) days to submit comments on the plan and design of those services.
- The State will 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, with equitable access to assistance under the State program funded under Title IV-A of the Social Security Act.
- The State has established and is enforcing 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.
- The State has established, and is enforcing, standards and procedures to screen and identify individuals receiving assistance who have a history of domestic violence, sexual assault, or stalking. While maintaining confidentiality, such individuals will be referred to counseling and supportive services and, pursuant to a determination of good cause, program requirements (such as time limits for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions), are waived in cases where compliance with such requirements would make it more difficult for them to escape domestic violence or would unfairly penalize them.
- Pursuant to Section 402(a)(8) of the Social Security Act (42 U.S.C. §602(a)(8)); Consolidated Appropriations Act, 2022, Section 703, as of March 15, 2023, and reflected in the form of amendment to the enclosed plan, the State has established, and is enforcing, standards and procedures, to ensure that applicants and potential applicants for TANF are notified of assistance made available by the state to victims of sexual harassment and survivors of domestic violence, sexual assault, or stalking.
- Pursuant to Section 402(a)(8) of the Social Security Act (42) U.S.C. §602(a)(8)); Consolidated Appropriations Act, 2022, Section 703, as of March 15, 2023, and reflected in the form of amendment to the enclosed plan, the State has established, and is enforcing, standards and procedures to ensure that case workers and other agency personnel responsible for administering the TANF program are trained in: the nature and dynamics of sexual harassment and domestic violence, sexual assault, and stalking; state standards and procedures relation to the prevention of, and assistance for, individuals who are victims of sexual harassment or survivors of domestic violence, sexual assault, or stalking; and methods of ascertaining and ensuring the confidentiality of personal information and documentation related to applicants for assistance and their children who have provided notice about their experiences of sexual harassment, domestic violence, sexual assault, or stalking.

- Pursuant to Section 402(a)(8) of the Social Security Act (42) U.S.C. §602(a)(8)); Consolidated Appropriations Act, 2022, Section 703, as of March 15, 2023, the State has established, and is enforcing, standards and procedures regarding the screening for, and identification of, domestic violence, sexual assault, or stalking pursuant to Section 402(a)(8) of the Social Security Act (42) U.S.C. §602(a)(7)). While also ensuring the program funded under the aforementioned Act provides information about the options under this provision to current and potential beneficiaries; and case workers and other agency personnel responsible for administering the program are provided with training regarding State standards and procedures pursuant to Section 402(a)(8) of the Social Security Act (42) U.S.C. §602(a)(7)).

Joshua Stein, Governor
State of North Carolina

August 25, 2026
Date

APPENDIX A Electronic Funds Transfer

Section 4004 of the Middle Class Tax Relief and Job Creation Act of 2012 (P.L. 112-96) amends the Social Security Act, adding a requirement for states receiving TANF grants to "maintain policies and practices necessary to prevent assistance provided under the State program funded under this part from being used in any electronic benefit transfer transaction in any liquor store, any casino or gambling establishment, or retail establishment which provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for establishment." The new requirements aim to ensure that cash assistance is used in a manner consistent with the purposes of TANF and to serve to promote the integrity of the program and the responsible stewardship of public funds.

There are currently two methods of issuance for Work First payments - electronic funds transfer (EFT), or electronic benefit transfer (EBT) card. This allows benefits to be provided in a timely manner, reduces theft and fraud, and eliminates possible exposure to paycheck-cashing fees. The methods of issuance are direct deposit to the individuals' checking or savings account or EBT card. Direct deposit allows for the monthly Work First Cash Assistance payment to be electronically deposited to a personal savings or checking account of the case head. EBT is an electronic system that allows recipients to access their benefits with a plastic card, like a bank card.

Procedures and Strategies

In accordance with federal law, the Division is required to develop policies and procedures to prevent access to Work First Cash Assistance payment through electronic fund transactions at casinos, liquor stores, and establishments providing adult-oriented entertainment. The Division is also required to ensure recipients have adequate access to their cash assistance, and ensure recipients incur minimal fees or charges when using or withdrawing cash assistance funds.

For compliance, the Division implemented an education campaign for all Work First program applicants and recipients for compliance with the federal law. There was mass mailing to all Work First recipients regarding the transition to electronic payments in English and Spanish text. The electronic benefits brochure was revised and distributed at initial application, eligibility review, and upon participant request. Work First applications are completed onsite at the local agency unless reasonable accommodations are required. The brochure explains the EBT payment process including; transaction restrictions for Work First Cash Assistance, related fees and access schedules. The Public Assistance Rights and Responsibilities Form, which is given to all applicants and recipients, has been revised to include language regarding EBT use restrictions. A Frequently Asked Questions (FAQ) about Electronic Benefits document was developed and is posted on the Division of Social Services public website for public viewing. The online FAQ reflects the EBT brochure's information which is always accessible for public viewing and agency use.

The Division collaborates with state and local agencies which regulate gaming, adult entertainment and liquor stores. The agencies are the North Carolina Alcohol Beverage Control (ABC) Commission, the local ABC Boards, North Carolina Public Safety and the

Tribal Gaming Commission. Letters were mailed to the aforementioned regulatory and licensing agencies to educate and inform of the federal law regarding EBT transactions in the proscribed retail establishments. A request was also made to these agencies to partner and collaborate with the agencies in developing additional strategies for enforcement. These regulatory and licensing agencies were provided with a facsimile of the EBT card to acquaint them with this prohibited method of payment. The Division will have ongoing dialogue with the agencies to evaluate the effectiveness of this initiative and to implement additional strategies as necessary.

The Division provided local social service agencies policy guidance regarding the transition to electronic payment issuance and EBT restrictions. Local social service agencies have access to EBT brochures and FAQ for distribution when engaging applicants and recipients to ensure that recipients are aware of the EBT fees and restrictions. Local social service agencies are encouraged to ensure that Work First recipients are informed and reminded of the restrictions on a regular basis.

The Division continues to develop and implement strategies for EBT restrictions. These ongoing steps include collaborating with the EBT vendor to identify and block access to restricted Automated Teller Machines (ATM) and to monitor and maintain a current list of prohibited locations. Specific control methods and/or system enhancements include, but not be limited to:

a) Identifying locations where EBT cash transactions are prohibited;

b) Blocking ATM cash transactions at specified locations; and

c) Blocking EBT cash purchase transactions at the following locations:

1. Drinking Places (Alcoholic Beverages) – Bars, Taverns, Nightclubs
2. Package Stores – Beer, Wine, Liquor
3. Betting – including Lottery/Casino/Wagers at Race Track
4. Sweepstakes Parlors – online gambling
5. Adult Entertainment – nightclubs, strip clubs

The Division will periodically evaluate the effectiveness of the policies and procedures to prevent the use of Work First payments via electronic benefit transactions at specific locations and adjust policies as necessary.

Policies and Fees

There may be fees associated with direct deposit that are imposed by the recipients' financial institution. These fees are the responsibility of the recipient. The financial institution cannot impose charges for an account that it does not impose on its other customers for that same type of account.

Work First households will receive the initial EBT card at no cost. If the family receives Food and Nutrition Services (FNS) benefits, the Work First payment may be issued on the same card. The first cash withdrawal transaction at an Automated Teller Machine (ATM) is free. There is a $0.85 for each additional cash withdrawal. There are not any fees for point-of sale (POS) transactions. Work First households that request a

replacement EBT card shall be assessed a $2.50 fee. The fee shall be deducted from the account of the Work First household. The fee shall be refunded if the EBT card:

a) was lost in the mail or damaged by the vendor prior to receipt by the Work First household
b) is being replaced due to a name change on card
c) was lost due to a natural disaster such as a fire, flood, tornado or hurricane
d) was damaged by a retailer or vendor.

Fees associated with the use of the EBT card will be deducted from the balance of the card based on the available benefits in the account. If the recipient is receiving FNS benefits and Work First, the $2.50 card replacement fee will be deducted from the FNS allotment first. If there are not sufficient funds in the FNS EBT account or the recipient does receive FNS, the replacement card fee will be deducted from the program account with funds available to cover the fee. If there are not sufficient funds in any single account, the EBT system will issue the card and deduct the funds at the next benefit issuance.

Ensuring Adequate Access

Many Work First households do not have access to transportation or the funds for transportation if ATM or POS machines in their neighborhoods are restricted and they are forced to travel further to obtain benefits. To ensure adequate access, the Division: (1) allows recipients to withdraw funds based on their needs, without any restrictions on frequency or amount; (2) provides the choice to receive funds via direct deposit or EBT; (3) provides information regarding fees and surcharges, at minimum, during the application and review process.

All local county agencies are required to inform and discuss with all applicants/recipients the Electronic Issuance process, so the best decision can be made for the family. EBT Brochures and a Frequently Asked Questions (FAQ) flyer are available at the local county agency. Counties maintain inventory of EBT brochures. Counties can order brochures yearly or as needed. The FAQ is also available on the DSS website. The Division continues to collaborate with local agencies to ensure adequate access to benefits and to mitigate any access barriers as identified for participants.

Misuse

The Division applies compliance measures when it is determined there is EBT misuse. Misuse of the card may result in the following:

- a determination of fraudulent activity and repayment of benefits;
- assignment of a protective payee; and/or
- loss of cash assistance benefits.

At the initial infraction, a protective payee will be assigned for a period of six (6) months or until the next case review, whichever is less. If a protective payee is assigned the Work First cash assistance payment will be issued on a separate EBT dedicated to the Work First payment only. Co-mingled funds (Work First and FNS funds) issued on the same card will be issued on a separate EBT card if a violation occurs.

Subsequent infractions may result in the case head being excluded from the Work First Cash Assistance payment. The children will remain eligible for the reduced cash assistance payment with an assigned protective payee. The case head will remain subject to the cash assistance time limits, program requirements and work requirements if applicable. In addition, efforts will be made to recoup any funds accessed or used in the restricted locations.

Individuals who inadvertently use an EBT card at prohibited locations will be evaluated on a case-by-case basis to ensure non-discrimination. When violations are identified, such actions are subject to applicable appeals procedures needed to meet due process requirements. The Division will determine on an individual basis and/or evaluate for good cause if benefits should be terminated for the whole family or adults only.

Monitoring

North Carolina partnered with Fidelity Information Services (FIS) and implemented a Fraud Navigator Alert Detail Report in February 2019. The Fraud Navigator Alert Detail report includes a Merchant Category Code (MCC) which blocks and intercepts EBT transactions attempted at risky locations, which are identified by their MCCs. FIS is currently blocking EBT transactions from casinos, gambling casinos or gaming establishments or any retail establishment which provides adult oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment. The Work First Monitor reviews the Fraud Navigator Alert Detail Report of any blocked transactions in the FIS ebtEDGE website using the Fraud Navigator tool.

APPENDIX B WORK OVER WELFARE IN CABARRUS COUNTY

In legislation ratified June 12, 2003, the North Carolina General Assembly provided for the continuation of the Work Over Welfare (WOW) Program in Cabarrus County as a demonstration welfare reform program for certain Work First and Food and Nutrition Services recipients.

Except as described below, Work First in Cabarrus County operates under the standard policies described in the State TANF Plan.

The Cabarrus County WOW Program provides job opportunities to all able-bodied Work First and FNS recipients who are required to participate in Work First Employment Services.

WOW is primarily a wage-supplementation program that diverts the Work First benefits that would be paid to recipients to match employer funds and subsidize the recipients' wages.

Wages paid to WOW participants, which contain grant-diverted funds, are exempt from income for purpose of determining eligibility for assistance.

Participants are subject to the termination of Work First benefits for the household the month following any month in which they fail to comply with participation requirements. Benefits are restored after the client agrees to comply with requirements and files a new application.

To ensure that children are not harmed, sanctioned households are monitored by social workers, and benefits may be paid directly to vendors for basic needs.

All individuals will be evaluated for ongoing Medicaid any time Work First terminates.

A recipient who voluntarily terminates employment without good cause will be ineligible for Work First until the individual returns to work, provided work opportunities are available.

Failure or refusal to pursue child support without good cause is grounds for denial of benefits.

Benefit Diversion payments will be made in amounts up to one thousand two hundred dollars ($1,200). Applicants receiving the diversion payment will not be eligible for ongoing Work First benefits for a period of three months from the date of receipt of the diversion payment. Individuals receiving a diversion payment must attend budgetary counseling and may be required to have a protective payee for the diversion payment.

Federal funds may be transferred from the TANF Block Grant to the Social Services Block Grant to be used to pay for home studies, attorney fees, and ongoing cash payments for the adoptive family, and other adoption expenses for Work First children who are living with relatives other than their biological parents.

APPENDIX C - ELECTING COUNTY PROTOCOLS

BEAUFORT COUNTY

1. If a participant receives Benefit Diversion and subsequently applies for and begins to receive Work First cash assistance during the next 12 months, the participant will be responsible for paying back any diversion assistance that has been received.
2. No exception to family cap policy for a child born to a minor mother.
3. At or below 200% of the poverty level, an applicant must be actively seeking employment or be employed. The certification period will be for three months with the possibility of an extension not to exceed six months within a 12-month period.
4. Beaufort County will provide an emergency assistance payment to Safety Resource families that request assistance with caring for children placed in their home by Child Welfare when the permanent plan is to return the children(ren) to the parent's care within six (6) months.
5. Caretakers are encouraged to seek legal custody for child(ren).
6. Single parents with a child three (3) months-old or younger are exempt from the requirement to participate in Work First employment activities.
7. All mandatory (able-bodied) participants will be required to complete at least 35 hours per week of work or work-related activities. The hourly requirements for two parent households are, 35 hours per week of work or, work related activities. If federally funded child care is involved, then the hourly requirement for a two-parent household is required to complete 55 hours per week of work or work-related activities.
8. Job search and time sheets must be submitted weekly.
9. Direct reimbursement of transportation expenses for use of a personal vehicle is limited to the reimbursements rate for county employees.
10. All mandatory Work First Employment participants are encouraged to complete high school or GED within 24-month time limit.
11. All mandatory Work First Employment participants with employment-related physical or mental limitations will be referred to VR for assessment of eligibility or ineligibility for services
12. Three-step hearing process: (1) local hearing with hearing officer designated by Agency Director; (2) Hearing before DSS Board and (3) Petition to Superior Court
13. Local hearing decision will be mailed to participant via certified mail. Participant will have 15 days to request a hearing at the second level, which is before the DSS Board. Failure to request hearing within the 15-day time frame will result in forfeiting their right to appeal local hearing officers' decision.
14. Agency will assist participants in obtaining verification of citizenship and/or identity.

CALDWELL COUNTY

1. Applicant is responsible for all verifications needed to complete the application. Caldwell County will assist applicants with disabilities or limited English proficiency upon request.
2. Benefit Diversion may be offered only once every two years. Once a case is approved as Benefit Diversion the family cannot receive diversion assistance again for 2 years after the end of the certification period.

3. An application will be denied if the applicant does not comply with a signed Mutual Responsibility Agreement (MRA) unless there is good cause.
4. All applicants must meet and cooperate with child support within 10 calendar days of applying for Work First. Failure to do so will result in the application being denied on the 11th day unless there is good cause. Recipients must continue to cooperate with child support ongoing or the Work First case will terminate unless there is good cause.
5. All applicants, parents, and caretakers unless otherwise specified, must complete the economic budget class with a minimum attendance time of 2 hours within 10 calendar days of applying for Work First. Failure to do so will result in the application being denied on the 11th day unless there is good cause. Attendance will not be required if the applicant has successfully completed the class with a minimum attendance time of 2 hours within 30 calendar days prior to the application date. Non-parent caretakers may be exempt from the budget class per case manager discretion.
6. If both quarterly reporting deadlines are missed without good cause, there will be one (1) month of ineligibility.
7. Participants' statement of kinship will be acceptable at review unless questionable.
8. Cases will not be re-opened unless it is an agency error. The applicant/recipient may reapply for Work First.
9. All income, with the exception of SSI income, will be counted for parents living in the home to determine Work First eligibility
10. Recipients who are no longer eligible for Work First and are then placed on Transitional Medicaid are required to continue cooperation with Child Support if the Transitional Medicaid case remains active. Failure to do so will result in Medicaid benefits terminating for the adult caretaker(s) unless good cause exists. Ongoing Medicaid will be evaluated for the child(ren) in the household.
11. School attendance – The caretaker must provide proof of school attendance for all school-age children at application and review by providing a current report card, attendance summary printout from the school or enrollment verification if a new student in the Caldwell County school system. Work First case managers verify school attendance with school social workers on a monthly basis. Therefore, it is not necessary for the case managers to call the schools when a quarterly report is received. Failure to provide proof of school attendance or verification of enrollment at review results in an incomplete review unless there is good cause. Failure to provide proof of school attendance or verification of enrollment at application results in the application being denied unless there is good cause. All income, except for SSI income, will be counted for parents living in the home to determine Work First eligibility.
12. All children in K – 8th grades cannot have more than ten (10) unexcused absences in a school grading period unless there is good cause. All children in 9th – 12th grades cannot have more than 10 unexcused cumulative class absences in a grading period unless there is good cause. More than ten (10) unexcused absences will result in a sanction of one (1) month of ineligibility or until compliance whichever is greater.
13. Cases where all children in the household are receiving SSI benefits will not be eligible for Work First as there is no eligible child in the home.

14. Single parents may claim the single custodial parent claiming newborn exemption for the first three (3) months of a child's life. Once the 12-month lifetime exemption has been exhausted the parent will be required to participate in the employment program as soon as authorization is given from their doctor. Also, if a parent volunteers to participate in the employment program, he/she may not reclaim the exemption for the same child.
15. All parents in the home must have their GED or high school diploma or be enrolled in a satisfactory attending education enhancement class (i.e., GED, adult high school, English as a Second Language, literacy, etc.) unless there is good cause. Verification of attendance and satisfactory progress will be provided monthly by the parent(s) or the Work First case will terminate unless there is good cause. Work First case managers will use the same GED attendance and progress verification form used for employment cases on all cases where the parent is in the home to measure this requirement. Parents will meet with the case manager monthly and enter into a Mutual Responsibility Agreement (MRA). Parents will be required to complete a minimum of 15 class hours per week unless there is good cause. Success of children depends on them having a good role model representing the importance of education.
16. All Work First cases will be reviewed every twelve (12) months.
17. All mandatory able-bodied Work First participants will be required to complete at least 35 hours per week of work or work-related activities to meet participation hours unless there is good cause.
18. All applicants whose Work First case terminated for not completing a review will be required to provide all verifications needed for the review (school attendance, health checkups, immunizations, etc.) when re-applying for Work First Cash Assistance within three (3) months of the termination date. The three (3)-month time period includes the one (1) month of ineligibility.

CATAWBA COUNTY

1. To approve a Benefit Diversion application, Applicants must complete the following requirements:
    A. cooperate with Child Support;
    B. apply or be receiving Food and Nutrition Services;
    C. register with Division of Workforce Solutions – NCWorks if not already employed or job being held for the applicant, and
    D. if monetarily eligible for Unemployment Benefits (UIB) must apply for the UIB.
2. Applicants must cooperate with child support within 12 calendar days of applying for Work First cash assistance. If the applicant fails or refuses to do so without good cause, deny the application for Work First cash assistance.
3. Applicants must apply for Medicaid or be receiving Medicaid before applying for Work First.
4. Applicants must be receiving Food and Nutrition Services (FNS) (food assistance) or be evaluated for FNS within 12 calendar days of applying for Work First cash assistance. If the applicant fails or refuses to do so without good cause, deny the application for Work First and notify the Medicaid worker (applicants must apply for Medicaid before applying for Work First cash assistance).
5. All Work First applicants and recipients referred to Vocational Rehabilitation must complete the application and comply with all recommendations. Failure or refusal to

comply without good cause will result in the case being denied or terminated. Future eligibility is contingent upon completing application and cooperating with Vocational Rehabilitation.

6. Cases where all children in the household are receiving SSI benefits will not be eligible for Work First as there is no eligible child in the home. This does not apply to Benefit Diversion cases.
7. Eliminate the resources limits for Child Only Cases. The county will follow the state's standard policy for all other cases.
8. When a Work First case is transferred to Catawba County, an appointment will be made for a client to come to the office within 10 business days to sign a new MRA and be evaluated for any needed documentation. Failure to keep the appointment will result in the Work First case being closed at the end of the current month (unless there is good cause).
9. If a Work First case is closed for any reason (without good cause), the case will not be eligible for re-open. The applicant/recipient may reapply for Work First.
10. All adults in an Employment case must have a High School Degree or equivalent OR be enrolled in GED or Adult High School classes unless there is good cause.
11. A Child Enhancement fund will be created to work with families in providing financial assistance to enhance the quality of life for the child. Examples: band fees, uniform fees, dues for Girl Scouts/Boy Scouts, etc.
12. Retention Services: Catawba County provides a one-time lump sum Employment Retention Bonus of $400 to Work First participants whose Work First check terminates due to earned income and who remain employed:
    - With the same employer (unless the change is an improvement), and
    - Employed full time (30+ hours per week) for four consecutive months following termination of their Work First Cash benefit, and
    - Income eligible based on the 200% level of poverty worksheet

LENOIR COUNTY

1. Applicants, excluding intact families, must cooperate with the Child Support Program before applying for Work First Cash Assistance.
2. Benefit levels may be adjusted at the Director's discretion based on the availability of funding.
3. A child may be temporarily absent from the home up to 6 months when placed with a safety resource by Child Welfare, provided that the permanent plan is to return the child to the parent/caretaker within that timeframe and the parent is compliant with the Child Welfare family plan.
4. All unemployed or under-employed adult applicants/participants must register for work at the Lenoir Community College (LCC), NCWorks Career Center and local temporary payment agencies within two (2) weeks of their application for Work First Cash Assistance benefits. Work First Eligible (WFE) participants must complete the Work Keys testing and Key Train on-line classes to obtain necessary skills for their desired field of work.
5. The family is not eligible for Work First Cash Assistance benefits for three (3) months after voluntarily quitting a job, or a WFE work experience placement, voluntarily reducing work hours or abandoning a job without the family

demonstrating a good cause reason. The family is not eligible for Work First Cash Assistance for up to three (3) months if the parent is fired from a paid job or WFE work experience placement without demonstrating a good cause reason. Work First cash assistance benefits will terminate if the WFE participant is non-compliant with the MRA for three (3) consecutive months. Job abandonment is defined as failing to go to work, failure to notify the employer, and failure to report to a work experience placement. For applicants, the look back period begins three (3) months prior to the month of application. For recipients, the three (3) months of ineligibility begins following expiration of advance notice. The participant may cure this sanction by locating equivalent employment. The family is not eligible for Work First Cash Assistance for up to three (3) months if the parent is fired from a paid job or work experience placement unless there is good cause.

6. First level hearings will be heard by Agency Supervisors not involved with Work First Cash Assistance or WFE. Second level hearings will be heard by the Lenoir County DSS Board. The appellant may petition the Lenoir County Superior Court if dissatisfied with the result of the Level 2 hearing. The Lenoir County DSS Board will serve as hearing officer for Hardship Extensions to the 24- and 60-month time limits.
7. Transportation reimbursement is limited to $8 per day for in-county travel and $11 per day for out-of-county travel when the participant provides his/her own transportation. Transportation services for non-custodial parents of a Work First child and non-Work First families with a total income not exceeding 200% of the federal poverty limit are limited to $600 per month up to a maximum of $1200 or four (4) consecutive months in a State Fiscal Year.
8. If funding allows, Lenoir County will provide a supplemental payment for up to six (6) months to Safety Resource families with whom children are placed by Child Welfare and when the permanent plan is to return the child(ren) to the parent's care within six (6) months when the family requests assistance, provided the family's income is below 200% of poverty. This payment is intended to provide the Safety Resource family with additional financial support to care for these additional children and meet the increased expenses associated with bringing a new child or children into the home. The payment may continue for a maximum of six (6) months, until the child(ren) no longer resides with the Safety Resource family, or until available funding is exhausted, whichever occurs first. Payments will be made at the point of placement and at the first of subsequent months. The payment to Safety Resource families will be equal to the child-only Work First payment for the children placed with a safety resource. County MOE and/or Federal TANF funds will support this payment.
9. Single parents of a child less than three (3) months old may request an exemption from work requirements up to a maximum of 12 months in a lifetime.

LINCOLN COUNTY

1. All applicants seeking Work First cash assistance for children with an absent parent are referred to Child Support immediately after signing an application for Work First.
2. Thorough evaluations of the situation and the suitability of the child placement in child only cases will be completed. Interviewing all adults and children will be

conducted right away. These interviews will go on at least once every six (6) months, or more frequently if needed. A family-centered service plan will be created using all the data.

3. Benefit Diversion requirements will be as follows: able-bodied single parent and two (2) parent households being considered for Benefit Diversion must have employment (35 hours per week) beginning within two (2) weeks of WF application. Benefit Diversion will be approved for one to three (1-3) months depending on circumstances and assessments of needs.
4. Adult Incentive Program – The Road to Success
   This program will be used to provide incentives to adults participating in employment services. The intent is to reward participants for job readiness skill advancement and extra effort put forth in their search for permanent employment and self-sufficiency. Incentives will be in the form of gift cards that will allow participants to purchase personal items, or to spoil themselves as a result of their successful efforts. There are eight (8) activities along the way and three (3) rewards
   Youth Incentive Program
   The youth incentive program is less structured than the adult program to allow for flexibility and each unique child. The incentives are similar and will be given as progress is made toward achieving their educational goals. The social worker will begin engaging with youth aged 14 and up to begin the discussion and goal planning for their future. The purpose of these incentives is to help instill a strong work ethic (success brings reward) at an early age. The program places an emphasis on education, or the work experience needed to achieve their future goals and dreams.

MACON COUNTY

1. To receive Work First, the children must live with an adult relative who is within a certain degree of kinship:
   A. Parent, including a biological mother, father, and adoptive parent.
   B. Legal father or mother, step-parents.
   C. An alleged biological or legal father or other alleged paternal relatives.
   D. Spouses of these individuals also meet kinship even if the marriage has been terminated by death or divorce.
   E. Grandparents, great-grandparents, great-great-grandparents.
   F. Uncles or aunts, great uncle or aunt, great-great uncle or aunt, nephew, niece, first cousin.
   G. Brother, sister, half-brothers, half-sister, stepbrother and stepsister.
   H. Other adults who have court ordered legal custody or legal guardianship of a child.
   I. Brother, sister, including half-brothers and sisters.

   Biological parents and relatives are not eligible to receive Work First for a child that has been adopted out of the family. This relative must be providing care for the child on a day-to-day basis and be responsible for ongoing decisions regarding the child's well-being. A relative who meets the above relationships must be included in the case with the child, unless they are an SSI recipient receiving SSI benefits. The agency will comply with the State Standard Plan of Kinship requirements.
2. All Work First applicants will have a three-month penalty imposed for quitting a job unless "good cause" is established by the Work First case manager with approval

from the Income Maintenance Supervisor. The ineligibility period is defined as the month of application and the next three months. The individual may reapply for Work First at any time but is ineligible for benefits during the job quit penalty period. There is no cure for the job quit penalty once the penalty begins.

3. All work eligible family participants will be required to participate in countable work and work-related activities to be completed satisfactorily in order for this agency to provide a benefit payment. Families who fail to complete their required hours as agreed within their MRA are considered to be in non-compliance. Families must complete the required hours to be eligible to receive the benefit assistance.
4. All Work First work eligible individuals are required to be actively participating in work and work-related activities for a total of 40 hours per week. All activities must have documentation of competition verified and approved by the Work First case manager prior to payment being released. Documentation must be maintained in the case file. Participation will be a combination of activities which include but not limited to employment, subsidized employment, vocational training, skills training, education, work experience, substance abuse counseling, mental health, vocational rehabilitation, and job readiness/job search.
5. Reviews for Child-Only cases will be completed every year unless the following circumstances indicate an earlier review:
   - the child reaches 18 years of age;
   - the child moves out of the home of the caregiver; or
   - the death of the caregiver.

   Macon County will forego the first six-month review as stated in the TANF State Plan and review each case annually.
6. Retention Assistance -The agency will provide assistance to working families for up to 3 months after leaving Work First for work.
7. Macon County elects to retain the work requirement policy for single parents of children under the age of three months. This policy will be limited to a three-month exemptions period per child not to exceed a lifetime maximum of 12 months.

WILSON COUNTY

1. Wilson County calls its plan the Work First and Child Safety Plan. Immediate participation in intensive employment services for all “work eligible” families is necessary in order to meet the participation rate and to ensure families are adequately served before the end of the two-year/five-year time limits. All work eligible families applying for Work First Cash Assistance are provided with employment services and work supports to achieve economic independence. Families are held accountable to comply with their MRA Plan of Action and MRA Core. The participant will be required to participate in required employment related activities determined by the participant and social worker on the MRA. The Social Worker will work with the participant toward eliminating barriers that prevent the participant from successfully obtaining a job and retaining it, long-term. Wilson County DSS will comply with the Americans with Disabilities Act. Applicants will be screened and offered the opportunity to state they have a disability and ask for accommodation.

2. Many of the children in the Child Only cases are in relative placements. The relative caregivers may have difficulty dealing with the emotional and behavioral problems

the children display. The Child Only worker will refer on a case-by-case basis to the Kinship Program Social Worker who will provide intervention strategies to reduce the complexity of the challenges faced by this population. Family-centered approach is utilized in working with relative caregivers or parents in developing a service plan that best meets the needs of the family and will have the greatest intervention impact. A twice monthly group is also offered to Kinship families to discuss the successes and challenges experienced when taking on the responsibility of surrogate parenting. Child Only cases are not subject to work requirements. However, all NC FAST cases that have a custodial parent (biological, adoptive or stepparent) living in the home and are not included in the Work First case are subjected to a 60-Month State time clock. The child must be a legal U.S. citizen to be eligible.

3. Education will be supported in combination with other federal countable work activities. Families will continue to be assessed and referred to educational and training facilities such as Wilson Community College, Opportunities Industrialization Center (OIC) and NCWorks for education and training opportunities.

4. Families can be assisted with miscellaneous items or services needed to participate in an agreed upon activity that can lead to employment, parenting education, or financial education training. Items may include, but not limited to uniforms, shoes, tools, registration fees, insurance coverage books, assessments, meals/refreshments, academic and financial behavior incentives/retention bonuses, etc.

5. It is vital for the family to move toward independence and self-sufficiency and that both parents of the child(ren) provide financial support for their children. Under the Work First plan all persons applying for Work First cash assistance must complete a Child Support application prior to making a Work First application.

6. Wilson DSS will provide exemption from the work requirements for single custodial parents based on the age of the child. The age limit to receive the exemption is birth to three months of age**.** Any single custodial parent who does not have a child between the ages of birth to three months old will not be eligible to claim the Exemption

7. There will be a two-tier appeals process that complies with state law (G.S. 108A-79).

8. Helping Work First parents and caregivers keep their children in school and progress toward graduation is a major focus of our Work First staff. Social Workers work with the entire family on promoting education and training and the responsibilities of parents to ensure teens remain in school. As part of the Work First “core requirements” parents/caregivers are expected to keep their children in school. Failure to keep their children in school can result in financial penalty/sanction or termination of the Work-First cash assistance payment.

9. Wilson County will serve families with dependent children, ages zero through 17 years, who are actively attending school, registered with ESC and are actively seeking employment, or are employed. All adults in the family, under age 65, must

be working or registered for employment, actively seeking employment, or unable to work verified by a doctor's statement. This does not include pregnant women without other children.

10. All Family First "work eligible" individuals are required to be actively participating in work- and work-related activities for a minimum of 35 hours per week. Participation will be a combination of activities which include but not limited to employment, subsidized employment, vocational training, skills training, education, work experience, substance abuse counseling, mental health, vocational rehabilitation, job readiness/job search, etc. Participants will be required to establish the first 20 hours of their participation in "federally countable activities" as stated in the NC Work First Policy. Education will be supported in combination with other federal countable work activities. In two-parent households, both parents in the case must be work eligible. The parents may combine their hours to meet the required average of 35 hours per week, or 55 hours if they receive federally funded child care.

11. Wilson County commits a percentage of our Work First Block Grant to provide services to families with children whose household income is at, or below 200% of the poverty level. 200% services will be offered to TANF families who do not receive Work First Cash Assistance to ensure that all family members are progressing educationally and economically through intense case management services. Services are based on available funding.

12. Work First cases will be kept open until the third month of not receiving Work First Benefits. (This includes the month of application if employment services are being offered.) All applicants sign agreement at application stating they understand how this may affect their child support payments.

13. All Work First applicants will have a one (1)-month penalty imposed for quitting a job unless "good cause" is established.

14. All Work First cases will adhere to an eligibility review at least once every 12 months. Families are still expected to report changes or when information is received by other sources the eligibility worker may request a review more often if needed.

15. All Child Only Kinship Care cases that have a prior involvement with CPS, Prevention, Juvenile Justice or Foster Care within the last six (6) months will be required to comply with the Kinship Care Family Assessment. For families/children determined "at risk" of abuse, neglect, dependency or disruption of placement will be recommended for services. Services include on-going case management, strengths and needs assessment, referral services, advocacy, counseling, monitoring, etc.

16. All Child Only Family First Cash Assistance cases with children ages 6-17 who are not attending school regularly or whose grades are not on grade level will be required to comply with the Kinship Care Family Assessment. The goal is to help identify possible educational interventions to avoid children falling below grade levels and ultimately dropping out of school. Resources and services will be provided based on outcomes of the assessment and participation of both the child and caretaker. Caretakers who do not comply with the school requirements and

participate in the Kinship Care Family Assessment and who are determined to not have good cause will be sanctioned and may not be eligible to receive Family First payment (Family First Manual Sect 103).

17. Eliminate resource limit for families applying for Family First and money deposited into a bank account to which the household has access (i.e. lump sums such as taxes and child support).

APPENDIX D. SUMMARY OF PUBLIC COMMENTS RECEIVED

In compliance with federal and state statutes, the North Carolina Temporary Assistance for Needy Families (TANF) State Plan for FFY 2026-2028 was initially posted on the NCDHHS website for public comment July 31, 2025 – September 14, 2025, for the required 45-day period.