



**POLICY
NUMBER
013**

Administrative Policy

Title:	Up-Front Diversion		
Program:	Welfare Transition		
Effective:	June 21, 2004	Revised:	September 11, 2024

I. PURPOSE AND SCOPE

The purpose of this policy is to outline the requirements and procedures to local workforce development boards (LWDBs) for providing up-front diversion to applicants of Temporary Cash Assistance (TCA).

II. BACKGROUND

Individuals apply for TCA for many reasons including assistance with recurring needs such as shelter, utility payments, food, and monthly expenses. However, many applicants do not need ongoing TCA, but, due to an unexpected circumstance or emergency, require some immediate assistance to secure or retain employment or child support. These immediate obligations may include a shelter or utility payment, a car repair to continue employment, or other services that will alleviate the applicant's emergency financial need and allow the person to focus on obtaining or continuing employment. These needs may be met through up-front diversion, which is available only to applicants as an alternative to ongoing TCA, in accordance with section 445.017, Florida Statutes (F.S.) and 65A-4.212, Florida Administrative Code (F.A.C.).

House Bill 1267, effective July 1, 2024, amended section 445.017, F.S. to require LWDBs to administer the intake survey required under section 445.035(2), F.S., as part of the screening process for up-front diversion.

III. AUTHORITY

[Section 445.017, F.S.](#)

[Section 445.035\(2\), F.S.](#)

[Rule 65A-4.212, F.A.C.](#)

IV. POLICIES AND PROCEDURES

An applicant for TCA who is deemed eligible for up-front diversion may receive once in a lifetime a diversion payment of up to \$1,000. LWDBs are responsible for determining up-front diversion eligibility and approval on a case-by-case basis for the receipt of up-front diversion services, payment, or both in accordance with section 445.017, F.S.

Up-Front Diversion must involve the following four steps:

- a. Linking applicants with job opportunities as the first option¹.
- b. Offering supportive services, such as child care or transportation, as an alternative to TCA.
- c. Screening applicants to respond to emergency needs.
- d. Offering a one-time payment of up to \$1,000 per family.

An applicant may initiate a request for up-front diversion in various ways to include:

- Submitting a Request for Assistance (RFA) through the Department of Children and Families (DCF). DCF will explain Up-Front Diversion to the applicant. If the applicant is interested and DCF determines the applicant is potentially eligible for TCA and diversion, the applicant will be referred to the LWDB to complete the Up-Front Diversion process and initiate the Welfare Transition (WT) work registration process.
- During the application and WT work registration process, the LWDB may find the applicant to be a potential candidate for Up-Front Diversion. Because the applicant may not require on-going recurring TCA, the applicant can be evaluated as a potential candidate for the Up-Front Diversion at this time.
- An individual who has not applied for TCA may go to the local One-Stop Career Center and express interest regarding emergency assistance or an Up-Front Diversion payment. LWDB staff must refer the individual to DCF to submit an RFA for TCA.

¹ If the applicant has secured employment, provided documentation and has been determined eligible for diversion services, the appropriate services should be provided to ensure the applicant begins work and retains employment. If the applicant has not secured employment, the applicant should begin the process of referral to employment opportunities and diligent job search by LWDB staff.

A. Screening

Individuals applying for TCA and who indicate an interest for up-front diversion must be TCA-eligible in order to be referred by DCF to the appropriate LWDB for screening to determine up-front diversion eligibility. The TCA prescreening completed by DCF is an initial determination that applicants are potentially eligible for TCA. Applicants are referred to the appropriate LWDB to begin the WT work registration process and to be screened for up-front diversion eligibility.

Using the Up-front Diversion Screening form (FloridaCommerce WTP-2073), LWDBs will complete up-front diversion screening to determine if, due to an unexpected circumstance or emergency, applicants have short-term barriers to obtaining and maintaining employment or child support that could be met through up-front diversion, or if ongoing TCA is needed. The screening must identify barriers that, if corrected, may prevent the family from requiring TCA on a regular basis. Assistance to overcome a barrier to employment is not limited to cash, but may include vouchers or other in-kind benefits. At the time of up-front diversion screening, the LWDB must also administer the intake survey required under section 445.035(2), F.S.

LWDBs must retain all documentation used to determine and verify eligibility in the participant's hard copy or electronic case file. Staff must ensure that the One-Stop Service Tracking (OSST) system is updated to reflect activity entries and case notes to document the information received and outcome of the up-front diversion screening process, to include the approval or denial of the request.

a. Eligibility Criteria and Requirements

TCA applicants must meet the following eligibility criteria for up-front diversion:

1. The applicant must have a child(ren) under age 18 (or under age 19 if the child is still a full-time student in secondary school or at the equivalent level of career training, and does not include anyone who is married or divorced) residing in the home, or a pregnant woman in the family, and meets TCA eligibility criteria in accordance with sections 414.0252(8) and 414.095(5), (14)(a), F.S.
2. An explanation by the family of the unexpected circumstance or emergency situation and what may be needed to resolve it. Some examples of unexpected circumstances or emergency situations that may be considered short-term barriers to obtaining and maintaining employment or child support are:
 - a. automobile repairs;

- b. catching up on shelter payments to prevent eviction;
 - c. catching up on utility bills, except for cable television and long distance telephone charges, to prevent interruption of service;
 - d. medical services;
 - e. replacement of income lost due to medical leave without pay;
 - f. emergency child care while seeking permanent child care; and,
 - g. clothing, shoes, tools, or equipment necessary for employment.
3. A determination by the LWDB and the applicant as to whether the up-front diversion intervention will assist the family to overcome barriers to employment or child support and eliminate the need for ongoing TCA. This includes determining what the family would need to resolve the emergency situation, the family's plan for resolving the emergency situation, and, if necessary, a budget for meeting future expenses or reducing the likelihood of other emergency situations. The LWDB will utilize the OSST system's budget planner wizard to assist the family with creating a budget. The budget will be retained in the case file and a copy provided to the family.
 4. Verification that the individual is currently an applicant and is not currently receiving TCA.
 5. Verification that the applicant has not exhausted their TCA time limit. Once this limit is reached, individuals are no longer eligible for TCA, to include up-front diversion.
 6. Verification that the applicant has secured an on-going means for meeting monthly recurring expenses.

b. Identity Verification

LWDBs will document and verify applicant's identity through readily acceptable documentation that includes work or school ID cards, driver's license, voter's registration cards, and birth certificates.

c. Social Security Number (SSN)

A SSN is required for the TCA applicant interested in up-front diversion, or the applicant must apply for a SSN with the Social Security Administration. A SSN must be provided for each family member applicable to eligibility determination. If the applicant has received TCA, food assistance benefits or Medicaid in the past, the household members' SSN numbers should already be documented in the system.

d. Citizenship or Qualified Noncitizenship Status

Document the citizenship or qualified noncitizenship status of the individual requesting up-front diversion. If the individual is a qualified non-citizen, verification is required as indicated on the TANF Eligibility Form (FloridaCommerce WTP 0005(a)).

e. Information Pertinent to Determining Eligibility

LWDBs will document and accept applicant's statements, unless questionable, as to household composition, income, resources, or other information pertinent to determining eligibility. A self-attestation is acceptable. Printouts from DCF's FLORIDA system that document household composition are also acceptable.

B. Restriction on Application for TCA

LWDBs must notify applicants that receipt of up-front diversion will restrict application for TCA for three months unless an emergency is demonstrated to LWDB staff. LWDB staff must use the Agreement for Up-Front Diversion Payment/Service (FloridaCommerce WTP 2073) to notify applicants of this restriction. Both the applicant and LWDB staff must sign the Agreement for Up-Front Diversion Payment/Service (FloridaCommerce WTP 2073) signifying notification to the applicant of:

- a. Transitional services;
- b. Restriction on applying for TCA for three months; and
- c. Repayment requirement of up-front diversion payment (see **Section IV. D.** of this policy).

If a recipient of up-front diversion requests assistance from DCF prior to the three-month restriction period ending, he/she must demonstrate an emergency need to the LWDB to be approved for TCA. Note: The three-month restriction includes the month in which the diversion payment was received.

C. Approval or Denial for Payment of Up-front Diversion

The LWDB is responsible for the approval or denial of a family for receipt of up-front diversion services and determining the level of financial need for a one-time payment of up to, but not to exceed, \$1,000. Recipients of up-front diversion may be eligible for up-front diversion services such as child care or transportation; however, such services must be short term, non-recurrent services (cannot exceed four months) in accordance with 45 CFR Section 260.31(b) as described in **Section IV. E** of this policy. Families who are diverted from the receipt of ongoing TCA through up-front diversion may also be eligible to receive transitional support services such as child care and transportation as described in **Section IV. F** of this policy.

The Agreement for Up-Front Diversion Payment/Service form (FloridaCommerce WTP 2073) must be signed by the applicant indicating that he/she:

- Understands the amount the family is potentially eligible for;
- Understands that the family is declining to receive TCA for three months once the up-front diversion payment is received;
- Understands the family may apply for Medicaid or food stamps anytime in the future;
- Understands the up-front diversion payment up to \$1,000 is a once-in-a-lifetime benefit;
- Understands the family may be eligible to receive transitional child care (TCC) if (s)he is employed within 90 days of the start of the diversion process and the family's income does not exceed 200 percent of the Federal Poverty Level; and
- Understands that if the application for diversion is denied or the applicant chooses not to receive the Up-Front Diversion payment, the TCA application will be processed by DCF. LWDB staff must instruct such applicants to complete the WT work registration process to ensure their application for TCA continues to process with DCF for ongoing TCA benefits.

If the up-front diversion request is approved, the LWDB staff must complete the following with the applicant to include:

- a. Review the assessment results to determine what services may be needed by the applicant;
- b. Review the intake survey;
- c. Complete the [Career Ladder Identifier and Financial Forecaster \(CLIFF\) Dashboard tool](#);
- d. Complete the OSST Budget Planner Wizard; and
- e. Complete the exit survey using Jotform.

Note: If the up-front diversion request is not approved, the LWDB staff must complete steps a and b as listed above, in addition to completing the budget planner wizard in the OSST system.

For approved requests, the LWDB staff must stipulate the amount of the authorized payment, sign the Agreement for Up-Front Diversion Payment/Service (FloridaCommerce WTP 2073), and forward the completed form to the local DCF office via fax or email. A copy of the completed form must be retained in the case file. Once the LWDB's approval of up-front diversion is received, DCF must expedite the process and approve the payment within five working days.

The LWDB must also ensure that the applicant is notified that the up-front diversion payments and/or services will not count against the applicant's 48-month lifetime limit for receiving TCA.

D. Violation of Agreement and Repayment

If a family that received an up-front diversion payment applies for TCA within three months of receiving the payment, the family must be referred to the LWDB for work registration and verification of a determination that a demonstrated emergency exists. A qualified emergency reason may include:

- Hospitalization or illness resulting in a significant loss of income or employment;
- Loss of housing
- Natural disaster responsible for destruction of the family's property; or
- Other situations of similar nature affecting employment.

Upon receipt of the determination that the family meets emergency criteria, DCF will complete the TCA eligibility determination and calculate the repayment value of the up-front diversion payment. The up-front diversion repayment amount will be withheld from any TCA benefit for which the family is otherwise eligible. The amount to be withheld will be based on proration of the up-front diversion payment over eight months.

E. Up-Front Diversion as a Provision of Services

An applicant who is being considered for up-front diversion may or may not require a cash payment of up to \$1,000.00 to divert the family from receiving TCA on a recurring basis. The applicant may need a basic support service to secure employment, secure child support, or overcome an emergency. Support services include:

- Applicant support services to assist the applicant with job search activities, obtaining employment, initiating the WT work registration process, and/or retaining employment;
- Up-front diversion service provision as an alternative to TCA.

Applicant support services are short-term benefits to assist the TCA applicant with completing the TCA application process and obtaining or retaining employment. Applicant support services may include transportation assistance and child care. Applicant support services should not exceed 30 days due to DCF's time standard to approve or deny a TCA application. Applicant child care may be provided through the WT child care referral process.

Up-front diversion as a provision of services comprises short term, non-recurrent services (defined as no more than four months). Support services that are approved as a diversion from on-going cash assistance through local TANF dollars are considered "non-assistance" because the services are provided for a short time period and are

addressing an emergency need. These services are considered “diversion services,” not applicant services. The provision of services as up-front diversion must be recorded under the Service Plan portion of the Skill Development screen in OSST.

Applicants seeking up-front diversion may be provided support services for 30 days, provided there is local funding available and the services are provided in alignment with the LWDBs local operating procedures.

F. Transitional Services

Individuals who receive up-front diversion may be eligible for transitional child care or transitional services to accept, maintain, or actively seek employment, or to upgrade skills if their income does not exceed 200 percent of the federal poverty level and they meet the eligibility criteria in accordance with sections 445.029, 445.030, 445.031 and 445.032, F.S.

The applicant should be given a 30-day referral for applicant child care. The start date of the referral should be the date the up-front diversion process began. If the applicant has not obtained employment when the 30-day referral expires, the applicant is responsible for their own child care needs for the remainder of the 90-day time period. If the applicant obtains employment within 90 days of when the up-front diversion process began, a transitional child care (TCC) referral may be provided.

If the applicant secures employment within the 90-day time period and subsequently loses employment, the applicant is still eligible to receive a 30-day job search TCC referral that is available to any other transitional participant who loses employment.

Please refer to [Administrative Policy 020 – Transitional Services](#) for additional information regarding transitional services in the WT program.

G. Sanctioned Participants

During the screening process, a determination should be made whether the family applying for up-front diversion is currently sanctioned. Sanctioned families, including families receiving TCA through a protective payee, are not eligible for up-front diversion. Families with a current two or three level sanction in place must serve the minimum sanction period and then comply to have the sanction lifted before requesting up-front diversion. Once the applicant has complied to lift the sanction, the applicant must complete the application process with DCF. If interested in up-front diversion, the applicant must complete the up-front diversion process prior to DCF approving and issuing TCA benefits.

V. REVISION HISTORY

Date	Description
09/11/2024	Revised to align to House Bill 1267 requirements and issued by the Florida Department of Commerce.
06/21/2004	AWI Final Guidance 04-013, Welfare Transition Up-Front Diversion Program, issued by the Agency for Workforce Innovation.

VI. ATTACHMENTS

[Diversion Services Emergency Criteria Form](#) FloridaCommerce WTP 0001
[Eligibility Form for TANF Services](#) FloridaCommerce WTP 0005
[Up-Front Diversion Screening Form](#) FloridaCommerce WTP 2073