



**POLICY
NUMBER
025**

Title:	Hardship Extensions for Temporary Cash Assistance		
Program:	Welfare Transition		
Effective:	November 19, 2003	Revised:	September 11, 2024

I. PURPOSE AND SCOPE

The purpose of this policy is to outline the requirements and procedures to the Local Workforce Development Boards (LWDBs) for providing hardship extensions to Temporary Cash Assistance (TCA) recipients.

II. BACKGROUND

The Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996, also known as the 1996 Welfare Reform Act, became law effective August 22, 1996. The PRWORA changed cash assistance from an open-ended entitlement program to a time limited cash assistance program, created the federal Temporary Assistance to Needy Families (TANF) Program, which replaced the Aid to Families with Dependent Children and required work requirements of recipients in exchange for TCA. The state of Florida imposed a cumulative lifetime limit of 48 months receipt of cash assistance rather than the 60 months allowed by PRWORA.

The 48-month lifetime limit does not apply to:

- Cases in which a child is the only recipient. Therefore, any months that a minor child receives TCA are not counted towards their 48-month lifetime limit.
- An individual who receives Supplemental Security Income (SSI) benefits or Social Security Disability Insurance (SSDI) benefits.
- An individual who is the caretaker of a disabled family member. The case file must contain documentation that the disabled family member requires a caretaker and

that there are no other means by which the disabled family member can be cared for.

During the 2024 legislative session, House Bill (HB) 1267 was passed and required additional actions tied to recipients who are approaching the statutory time limitation for TCA. The bill requires that staff:

1. Collect information on the TCA recipient's enrollment in other benefits programs, long-term career plan, credentials, education, or training received during enrollment, barriers to employment addressed, and remaining barriers to employment through administration of an exit survey at the points of contact required when a TCA recipient becomes, or is anticipated to become, ineligible for TCA.
2. Utilize a financial tool such as the [Career Ladder Identifier and Financial Forecaster \(CLIFF\)](#) to demonstrate future financial impacts of the participant's change in income and benefits over time.

III. AUTHORITIES

[Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Public Law 104-193, Section 408](#)

[Florida Statutes \(FS\), Section 414.105](#)

[Florida Administrative Code Rule 65A 4.201](#)

IV. POLICIES AND PROCEDURES

The Department of Children and Families (DCF) is responsible for identifying time limits of TCA recipients and notifying the respective LWDB of those who are within six months of their 48-month time limit. The recipients are required to participate in an employability review conducted by the LWDB to gauge progress towards self-sufficiency and employment. During the employability review, the LWDB must:

1. Assess the participant's employment prospects.
2. Assess and identify barriers to employment.
3. Provide the appropriate services/referrals to assist with eliminating employment barriers.
4. Develop a plan to identify actions necessary to obtain employment prior to reaching the end of the time limit.
5. Review the hardship extension criteria with the participant and advise him/her whether he/she qualifies for a time limit extension recommendation.
6. Provide the participant information regarding a hardship extension, including his/her rights and responsibilities.

7. Administer the mandated exit survey to collect information on the participant at the point he/she becomes, or is anticipated to become, ineligible for TCA.
8. Assess the participant's potential change in income and benefits over time by utilizing the CLIFF Dashboard.

A. Hardship Extension

A hardship extension allows participants to receive additional months of TCA payments beyond the state established limit of 48 months. DCF is responsible for the review of the participant's TCA payment history to determine if the participant has reached 42 months of the 48-month lifetime limit. If the participant has received 42 months of time limited TCA, DCF notifies the LWDB. Upon notification, the LWDB schedules an interview with the participant to assess employment prospects and employment barriers, to evaluate the participant's participation in the Welfare Transition program, and to determine if a hardship extension is needed.

If the LWDB determines that an extension is warranted, a recommendation must be made to DCF to extend TCA payments beyond the 48-month time limit. When DCF receives the recommendation and approves the hardship extension request, TCA payments will be extended for the number of months recommended by the LWDB.

1. To receive a hardship extension, an individual must meet one or more of the following eligibility criteria:
 - a. Diligent participation in work activities and the inability to obtain employment.
 - b. Diligent participation in work activities combined with extraordinary barriers to employment, including conditions that may result in an exemption from work requirements.
 - c. Diligent participation in work activities and a need by teen parents for an exemption in order to have 24 months of eligibility beyond receipt of the high school diploma or equivalent.
 - d. Significant barriers to employment combined with a need for additional time.
 - e. A recommendation of extension for a minor child of a participating family at the end of the eligibility period for TCA based on a review that determines the termination of a child's TCA would likely result in the child being placed into an emergency shelter or foster care.
 - f. The participant is a victim of domestic violence, if the effects of such violence delay or otherwise interrupt or adversely affect the participant's participation.
2. The LWDB must ensure individuals who receive a hardship extension comply with TANF work requirements.

The LWDB is responsible for initiating the hardship extension process and conducting an employability review for any current participant who previously refused a hardship extension, but later decides the hardship extension is needed. Former participants

(participant's case closed prior to the receipt of 48-month lifetime limit) who previously refused, but later decide to request a hardship extension, must be directed to complete an ACCESS Florida application for benefits via the DCF website.

In either case, if the LWDB determines that an extension is not warranted, the participant will only receive the allowable 48 months.

B. Processing Requests for Hardship Extension of Time Limits

1. To process requests for a hardship extension of time limited months, staff must:
 - a. Document receipt of the Hardship Extension Review Form (CF-ES 2082) in the One-Stop Service Tracking (OSST) system for the participant. A copy of the Hardship Extension Review Form must be retained in the participant's case file.
 - b. Schedule an employability review with the participant to assess employment potential and barriers. The employability review appointment is a mandatory appointment. The participant must be notified in writing that a mandatory employability review has been scheduled and provide the date, time and location via an appointment letter.
2. If the participant attends the employability review and requests a hardship extension, staff must:
 - a. Review the participant's case (participation, engagement, current circumstances, etc.) and indicate if a hardship extension criterion has been met.
 - b. Review the participant's employment potential and barriers to employment to assist with identifying actions necessary to become employed prior to reaching the TCA lifetime limit.
 - c. Review the employment potential and barriers to employment to assist with identifying actions necessary to become employed prior to reaching the TCA time limit.
 - d. Complete and discuss the budget planner wizard in OSST to assist the participant in developing a budget of monthly income and expenses. The budget planner wizard should be printed, signed by the participant, and retained in the case file.
 - e. Complete and discuss the results of the CLIFF Dashboard tool. A copy of the results should be provided to the participant and a copy retained in the case file. OSST must be updated with an entry of the activity code 30 on the Skill Development screen including the start date, completion date and closed with an outcome of "Complete".
 - f. Review the Hardship Extension Statement of Understanding Form (WTP 2086) with the participant. The form must be signed and dated by the participant and staff. A copy should be provided to the participant and a copy retained in the case file.

- h. Update the Hardship section of the Alternative Plan within OSST with the actions taken during the employability review process.
4. If the participant does not attend the appointment, staff must:
 - a. Update Section B on the Hardship Extension Review Form and document that the participant was a no-show.
 - b. Update the Alternative Plan in OSST and document that the participant was a no-show, and no extension is requested.
 - c. Return the completed Hardship Extension Review Form to DCF and retain a copy in the case file.
 - d. Initiate the pre-penalty counseling procedures as defined in [Administrative Policy 037 – Work Requirement Penalties and Pre-Penalty Counseling](#). Document the participant’s failure to meet for the mandatory employability review and the outcome of the pre-penalty counseling in the case notes.
 - e. Complete the exit survey via Jotform during the pre-penalty counseling, if pre-penalty counseling is successful. Enter an activity code 29 on the Skill Development screen in OSST including the start date, completion date and an outcome of “Complete”.
 - f. Update OSST with the actions taken as a result of the participant’s failure to attend the mandatory employability review.

Once the participant’s case is closed due to the expiration of time limited months, staff should refer the participant back to DCF and instruct them to complete an online application for benefits in the DCF’s ACCESS system.

C. Determination of Hardship Extension

If staff determines that an extension is needed, a recommendation is provided to DCF to extend TCA payments beyond the 48- month time limit. DCF is responsible for reviewing the recommendation and making a final determination to deny or approve hardship extension requests. When the LWDB is notified that DCF approved a hardship extension, staff must:

1. Schedule an appointment with the participant to discuss the hardship extension approval and continued program participation. Staff should also ensure the participant understands the end date of the hardship extension.
2. Develop or update the Individual Responsibility Plan (IRP) or Alternative Requirement Plan (ARP) to guide the actions needed to assist the participant in gaining employment prior to the expiration of the extension.
3. Engage the participant in work activities to remain compliant in the program. Staff must also provide support services or community referrals to assist the participant in overcoming barriers to program participation.
4. Explain that the participant must comply with his/her IRP and reiterate the work penalties that may be applied if the participant is noncompliant.

5. Update OSST with the actions taken during the appointment.

When the LWDB is notified that DCF denied a hardship extension, staff must:

1. Update OSST to reflect the denial of the hardship extension.
2. Contact and advise the participant of the denial of their hardship extension request.
3. Prepare the individual for the termination of cash assistance and offer him/her referrals for community resources that may assist with their continued path to self-sufficiency.
4. Inform the participant of his/her rights to request a fair hearing and file a grievance with DCF if the participant disagrees with the denial.
5. Complete and discuss the results of the CLIFF Dashboard tool. A copy of the results should be provided to the participant and a copy retained in the case file. OSST must be updated with an entry of the activity code 30 on the Skill Development screen including the start date, completion date and closed with an outcome of "Complete".
6. Complete the exit survey via Jotform. Enter an activity code 29 on the Skill Development screen in OSST with a start date, completion date and an outcome of "Complete".

D. Compliance Requirements

Participants who are on an extension are required to comply with their Individual Responsibility Plan (IRP). This document must include alternative activities, such as medical treatment, therapy, counseling appointments, and substance abuse/mental health services for participants who may have circumstances that prevent them from participating in traditional work activities. The development of this document must take into consideration the participant's situation and medical ability to comply. Failure of the participant to comply will result in pre-penalty counseling and may also result in a sanction being imposed. Special circumstances related to hardship extensions and program compliance include:

- Participants who have received an SSI/SSDI time limit extension and are subsequently sanctioned, may comply with the Welfare Transition program to lift their sanction in accordance with Administrative Policy 037 – Work Requirement Penalties and Pre-Penalty the Counseling. Note: The penalty period associated with the level of sanction imposed must be served if good cause is not provided.
- Non-compliant participants can be sanctioned for failure to comply with work activity requirements, alternative requirements, or plan requirements. The pre-penalty process must be initiated for noncompliant participants, regardless of the hardship extension. If sanctioned, the participant's TCA will close, and the remaining extension months, if any, will be voided.

- Participants cannot be prohibited from applying for the remainder of their hardship months, if their case is closed as a result of failure to comply with the work requirements after being approved for a hardship extension. If the participant reapplies for TCA or requests a review, he/she must complete an application for assistance. As a part of the application review process, DCF must complete the time limit review process form and forward the referral to the designated LWDB.

E. Right to Request or Withdraw

Prior to exhausting the 48-month time limit, a participant has the right to request an extension of the time limit. If the participant's TCA case is closed and the participant would like to request an extension, the LWDB must notify the participant to file a Request for Assistance (RFA) with DCF. If the participant is a current recipient of TCA and would like to request an extension, the LWDB staff must assist with initiating the process.

In addition, the participant has a right to withdraw a hardship extension request at any time by notifying his/her case manager at the LWDB. Staff must case note the request and promptly notify DCF of the participant's decision to withdraw the request.

F. Supplemental Security Income (SSI) Program and the Social Security Disability Insurance (SSDI) Program

The LWDB must require participants who apply for SSI/SSDI or file an appeal to submit supporting documentation. A participant who has applied for SSI or SSDI but has not yet received a determination must be granted an extension of the applicable time limit until a final determination has been made. DCF is responsible for reviewing the individual's time limit. If no application or appeal for SSI/SSDI is verified, DCF should forward the Hardship Extension Review Form (CF-ES 2082) to the LWDB. During the application and appeals process, the LWDB must require compliance by the participant with the established IRP or Alternative Requirement Plan (ARP) assigned by LWDB staff, based on the individual's documented medical ability to comply. If a final determination results in the denial of SSI or SSDI benefits, any months during which the individual received TCA will count against his/her 48-month lifetime limit.

G. Local Operating Procedures

The LWDB must develop local operating procedures (LOPs) for implementing hardship extensions.

The LOPs must include an emergency extension process for individuals whose time limits have ended and who are awaiting determination on a subsequent application.

H. State and Local Monitoring

LWDBs must enter data and case notes into the state's case management information system accurately and timely. Services and activities provided through the Welfare Transition program must be monitored annually for compliance with programmatic requirements by the Florida Department of Commerce (FloridaCommerce). FloridaCommerce will monitor the requirements outlined in this policy and local operating procedures. Additionally, LWDBs must establish local monitoring policies and procedures that include, at minimum:

1. The roles of the participant and LWDB staff related to hardship extensions.
2. Monitoring of hardship extension approvals and denials to ensure that all parties remain in compliance.

V. Definitions

Automated Community Connection to Economic Self-Sufficiency (ACCESS) - The automated system used by participants to access their participant file with DCF.

Diligent Participation – Engagement by participant where the participant must have no more than one work sanction imposed in the last 18 months of receipt of cash assistance and comply with the Individual Responsibility Plan as determined by the LWDB.

Extraordinary Barriers to Employment – A participant is considered to have extraordinary barriers when:

1. The individual has been a custodial parent of a child less than three months old.
2. The individual has been a single custodial parent caring for a child less than six years old, and proves he/she cannot obtain needed child care due to the unavailability of appropriate child care within a reasonable distance from the home or worksite, unavailability or unsuitability of informal child care by a relative or under other arrangements, or unavailability of appropriate and affordable formal child care arrangements.
3. The individual could not participate in assigned work activities due to a medical incapacity. The individual is required to comply with the course of treatment necessary for the individual to resume participation. The individual was excused from work activity requirements if the medical incapacity was verified by a licensed physician.
4. The individual was temporarily unable to participate in assigned work activities due to circumstances beyond their control as determined by the LWDB.

Significant Barriers to Employment – Includes illiteracy, language barriers, domestic violence, local labor surplus, underemployment, living in an area with a high unemployment rate, homelessness, previous felony convictions and unavailability of support services or transportation.

VI. REVISION HISTORY

Date	Description
September 11, 2024	Revised to align with House Bill 1267 and issued by the Florida Department of Commerce.
September 24, 2008	Issued by the Agency for Workforce Innovation.

VII. ATTACHMENTS

Hardship Extension Review Form, CF-ES-2082
Hardship Extension Statement of Understanding, FloridaCommerce WTP-2086