



Division of Community Assistance and Development

Policy & Procedures

Subject: Short-Term Crisis Services
Process Owner: Division of Community Assistance and Development
Effective Date: 07/01/2024
Revision Number: 2

SHORT-TERM CRISIS SERVICES POLICY

I. POLICY STATEMENT

Short-Term Crisis Services (STCS) is a Program designed to alleviate unforeseen emergency crises for households with children and temporarily assist households that are unable to use their own resources to pay necessary costs to prevent housing instability. STCS benefits can include emergency shelter, funds to secure a residence, eviction prevention assistance, utility assistance, and payment for unforeseen financial needs relating to securing or maintaining employment. The Program is administered by the Arizona Department of Economic Security (DES) through its Division of Community Assistance and Development (DCAD). DCAD contracts with Community Action Agencies (CAAs), tribal governments, and other nonprofits to deliver the Program to applicants in Arizona.

Revision 2

Updates definitions for clarity and consistency across DCAD policies.
Provides clarification for specified types of countable and exempt income.
Adds verification requirement for household members with no income.
Fixes typographical and formatting errors.

II.	TABLE OF CONTENTS	
I.	POLICY STATEMENT	1
II.	TABLE OF CONTENTS	2
III.	APPLICABILITY	3
IV.	AUTHORITY	3
V.	DEFINITIONS	3
VI.	STANDARDS	4
	A. Eligibility Requirements for STCS	5
	B. STCS Program Administration	5
	C. Process Development and Staff Training	6
	D. Fingerprint Clearance Cards	6
	E. Prudent Decision-Making Principles	6
	F. Document Retention Requirements	7
	G. Policy Administration	7
VII.	PROCEDURES	7
	A. Application Process	7
	B. Conflicts of Interest	8
	C. Application Requirements	8
	D. Household Eligibility	9
	E. Verification and Documentation	11
	F. Financial Qualification Guidelines	12
	G. Income Calculations	19
	H. Crisis Qualifications	20
	I. Benefit Limits	21
	J. Deciding a Case	22
	K. Decision Notices to Applicants	22
	L. Disbursement of Benefits	23
	M. Grievances	23
	N. Program Monitoring and Audits	24
	O. Confidentiality	25
	P. Welfare Fraud Prevention and Penalty	25
	APPENDIX A - Identity and Immigration Status Verification	27

III. **APPLICABILITY**

This policy applies to DES Employees, contracting staff, and Community Navigators who are involved in the administration of the Program.

IV. **AUTHORITY**

[A.R.S. § 46-241](#)

Short-Term Crisis Services

[A.R.S. Title 46](#)

Welfare

V. **DEFINITIONS**

Address Confidentiality Program (ACP): The Arizona Address Confidentiality Program (ACP) helps survivors of domestic violence, sexual offenses, and/or stalking from being located by the perpetrator through public Records. The ACP is administered by the Arizona Secretary of State's Office. For more information, see the [DCAD Address Confidentiality Program Policy](#).

Applicant (or Client): A person who applies for or receives Short Term Crisis Services, which can be stand-alone or additional utility crisis benefits, provided under this policy.

Boarder: A resident in a home which is owned by another person where a valid written lease agreement obligates the resident to pay rent to the homeowner when the boarder(s) and owner(s) live in the same residence.

Community Action Agency (CAA): A designated county, city, council of government, or private non-profit organization that contracts with DES to administer or provide outreach services for public assistance benefits.

Contract (or Agreement): The document which outlines the duties and responsibilities of a Contractor regarding delivery of goods and/or services, and/or administration of a Program, including award terms, compliance, reporting, organizational, and adjudication requirements.

Contractor: A non-federal entity that receives a contract or agreement for the purpose of carrying out part of a federal award, and/or providing goods and/or services for DCAD. The Contractor is responsible for administration of the Program or service delivery pursuant to the terms of the contractual or agreement. .

Division of Community Assistance and Development (DCAD, Division, or Recipient): The DES Division that assists Arizonans at risk of, experiencing, or transitioning from domestic or sexual violence, homelessness, or food, housing, and utility insecurity through direct and contracted delivery of services with community partners.

Eligibility Period: The duration of time during which an Applicant is eligible for a Program benefit. The Eligibility Period for STCS is 12 months (365 days), during which

an Applicant may receive a single benefit. The Eligibility Period begins on the date an Applicant is approved for benefits.

Employee: Any full-time or part-time worker, or temporary paid or unpaid worker, who is employed directly by DES.

Federal Poverty Guidelines (FPL): A level of household income determined annually by the United States Health & Human Services (HHS) and published in the Federal Register.

Home Visit: A visit to an Applicant's home by Contractor Staff to provide application assistance or case management services.

Household: Any individual or group of individuals who are living together as one economic unit for whom housing expenses (e.g. rent, utilities, food) are purchased in common.

Legal Permanent Guardian (LPG): A person who has been granted legal permanent guardianship of a minor child by the courts. The Legal Permanent Guardian has the power and responsibility of a custodial parent regarding the child's support, care, and education.

Qualified Noncitizen: A "qualified alien" as defined by the *Personal Responsibility and Work Opportunity Reconciliation Act of 1996* ([Pub. L. 104-193, 8 U.S.C. § 1641\(b\)](#)), see also, [LIHEAP IM 1998-25 on Interpretation of "Federal Public Benefits" Under the Welfare Reform Law](#)), who is not a citizen of the United States but is eligible for state and local public benefits programs based upon enumerated criteria. Qualified Noncitizens may fall into any of the following categories: Lawful/legal permanent residents; asylees; refugees; noncitizens paroled in the U.S. for at least one year; noncitizens whose deportations are being withheld; noncitizens granted conditional entry (prior to April 1, 1980), battered noncitizen spouses, battered noncitizen children, the noncitizen parents of battered children, and children of battered parents who fit certain criteria; Cuban/Haitian Entrants; or victims of a severe form of trafficking.

Recipient: A non-federal entity that receives a federal award directly from a federal awarding agency to carry out an activity under a federal program.

Roommate: A person living in the same residence together with one or more persons where they *collectively* have a written lease agreement obligating them to pay a landlord that resides outside of the rented premises. Roommates comprise one household for purposes of this policy.

Short Term Crisis Services (STCS or Program): The DES Program, administered by DCAD, that provides various temporary benefits to eligible Arizona households with children, in order to acquire or stabilize housing or employment.

VI. STANDARDS

A. Eligibility Requirements for STCS

1. Short Term Crisis Services (STCS) are designed to benefit households with children experiencing a temporary, unforeseen emergency crisis that they are unable to overcome with their own income or resources.
 - a. Types of assistance available under the STCS program include:
 - i. Emergency Shelter;
 - ii. Eviction and foreclosure prevention;
 - iii. Move-in assistance for homeless households:
 - a) that meet all other eligibility criteria; and
 - b) upon acquiring housing when the housing is intended to be a permanent home for the eligible household;
 - iv. Utility Assistance; and
 - v. Work-related assistance needed to secure or maintain employment which can include:
 - a) Needs related to obtaining or securing employment, such as:
 - 1) Transportation vouchers, e.g. for:
 - i) public transportation; and/or
 - ii) a bicycle or other item a Household member would (reasonably and safely) use to commute to a workplace;
 - 2) Tools and equipment.
 - b. The total gross income for the household is measured against the current FPL.

B. STCS Program Administration

1. STCS is administered by DES and delivered through contracted partners. Partners include CAAs, local government agencies, nonprofit organizations, and Tribal governments.
 - a. Contractors are responsible for:
 - i. Application Intake procedures;
 - ii. Adjudication of applications;
 - iii. Issuing approval or denial decisions based on Program guidelines;

- iv. Providing a grievance process for Applicants;
 - v. Disbursing funds on behalf of approved benefit recipients;
 - vi. Securing services or resources for clients approved for applicable crisis assistance appropriate to the case; and
 - vii. Data collection, document retention, and reporting.
- b. DES is responsible for:
- i. The selection of Contractors for Program Delivery;
 - ii. Contract administration and support;
 - iii. Managing and disbursing Program funds to Contractors;
 - iv. Administration of the Program according to applicable funding guidelines;
 - v. Program and policy development;
 - vi. Training guidance for Contractors;
 - vii. Timely reimbursement of program funds to Contractors;
 - viii. Compliance Monitoring; and
 - ix. Data collection, retention, and reporting guidance.

C. Process Development and Staff Training

- 1. STCS Contractors are required to develop and maintain program guides and training materials consistent with this policy, their Contract, and funding requirements. Specifically,
 - a. Contractor staff must be trained and monitored; and
 - b. Procedures created for Contractor staff must be documented and available for review and approval by DES.

D. Fingerprint Clearance Cards

- 1. CAAs are required to obtain fingerprint clearance cards for all volunteers and staff working with STCS Program Applicants.
- 2. DES 1-01-17, *Fingerprint Clearance Card Policy*, outlines the procedures necessary to obtain the Level 1 fingerprint clearance. A copy can be made available to the CAA at any time, and it is mandatory that the DES policy is incorporated into the CAA procedures.

E. Prudent Decision-Making Principles

- 1. The policies and procedures included in this Policy compile and prescribe guidance for determining eligibility, delivering benefits, and administering the Program. Employees and Community Navigators will use reason and

apply good judgment in making decisions when addressing specific needs or scenarios of an Applicant or Household not specifically addressed by this Policy or referenced Authority. Decision-making by Employees based on the best information available, program knowledge, experience, and expertise is referred to as the Prudent Decision-Making Principle. Prudence may also include seeking DCAD or DES guidance on specific Program or policy interpretation. Employees should document their rationale used to make decisions not contemplated by this Policy or Authority, and cite any applicable references.

F. Document Retention Requirements

1. Document retention requirements are determined by the State of Arizona and DES divisions may have internal program-specific retention schedules.
2. The Division appoints records liaisons to guide Programs with document retention requirements and provide support to Program teams.
3. For specific document retention guidance, a Contractor should work with its Program liaison to determine requirements for each type of document created while a Contractor for the Department.

G. Policy Administration

1. Updates and/or amendments to this Policy will be issued as complete numbered revisions, superseding this Policy, in conjunction with any relevant Policy Memorandum summarizing changes.
2. Minor clarification to this Policy may be issued in the form of Policy Memoranda, providing interim guidance between revisions.
3. Questions or requests for clarification regarding this policy should be submitted via email to:

dcadcaps@azdes.gov, and
dcadpolicy@azdes.gov

Subject: Short Term Crisis Services Policy Questions & Clarifications

Please include your name, a contact phone number, and details regarding your inquiry.

VII. PROCEDURES

A. Application Process

1. The Contractor is responsible for providing an application to a Client.
 - a. Create an application for STCS, which can be part of a single application for multiple Programs (provided all necessary items are included); and

- b. Provide written or electronic application access to public applicants, providing reasonable accommodations for Applicants upon request.
2. Contractors must retain all documentation completed or acquired as part of the application process.
3. An application for benefits can be submitted by any household Applicant within the Contractor's geographic service area. The application must be reviewed for eligibility and a decision made to approve or deny based on Program and funding guidelines.

B. Conflicts of Interest

1. Conflict of Interest.
 - a. *Personal Relationship:* A Contractor's staff may not review a Reconsideration request relating to any person that the staff member knows or otherwise has a personal relationship, including a friend, neighbor, relative, or other individual. Any such relationship, which may raise a question of the staff's impartiality, must be avoided.
 - b. *Prior Adjudication:* A member may not review a grievance relating to any person or case in which the staff made a prior adjudication decision.
2. Any Contractor's staff who identifies a Conflict of Interest in a request will notify the Supervisor of the conflict and take no action on the Applicant's case.
3. Applications submitted by a Staff member of a Contracted agency, for the benefit of their personal household, must be reviewed and approved or denied by the Contractor Organization's Director in writing.

C. Application Requirements

1. Applicants are required to provide information to establish eligibility for STCS. Contractor staff assist Applicants with obtaining the information and completing a paper or electronic application.
 - a. Applications must include the following information:
 - i. Name, address, and phone number (if one is available);
 - a) Contractors and Employees are required to comply with the DCAD [Address Confidentiality Policy \(ACP\)](#);
 - ii. Individual identification number, e.g. Social Security Number;
 - iii. Gender;
 - iv. Date of Birth;
 - v. Citizenship Status;
 - vi. Disability Status;

- vii. Gross monthly income;
 - viii. Description and explanation of crisis situation;
 - ix. Earned and unearned income (defined separately in this policy), 30 days prior to and including the date of application, for:
 - a) all household members age 18 and older
 - b) any 16 or 17 year-old, if not full-time high school student or equivalent; and
 - x. Identification documentation for:
 - a) one or more children and
 - b) one or more family members who reside in the home and have an established custodial or parental relationship with any qualifying child.
 - xi. Documented verification of the relationship of one or more children to the adult applicant. This policy separately outlines the types of relationships between a child and an adult family member in a potentially eligible household section.
2. Agencies may provide Home Visits to clients as long as there is a documented internal policy.

D. Household Eligibility

- 1. All Household Members must be listed on the application and included in the gross monthly income calculation unless exempted or excluded under this policy.
- 2. Household members include:
 - a. any family member with blood relation or relation by law residing in the home;
 - i. except with an established lease demonstrating rental payments to the owner of the house under a written lease obligation (see definition of Boarder);
 - b. minor children residing in the home; and
 - c. roommates in the same dwelling who *collectively* pay an outside landlord under a lease obligation (considered one household combined).
- 3. Boarders are residents in the household who pay the owner of the home rent under a written lease agreement.
 - a. Boarders are *not* members of the same household as the owner.

- b. Boarders are considered separate households for application purposes when a written rental agreement exists.
 - c. Income of boarders is considered separately from the owner of the home when a written lease exists:
 - i. a boarder (or group of boarders under the same lease) may apply for benefits separately from the owner of the home, and
 - ii. an owner of a home can apply for benefits without including the boarder's income as household income since the boarder is not considered a member of the homeowner's household; however:
 - a) the rent paid to the owner by a boarder (or group of boarders) is considered part of the homeowner's unearned (rental) income for the STCS application.
 - d. Boarders can be related to the owner of the home; or residents of a commercial boarding house as long as there is a written lease agreement establishing the legal relationship.
4. Members residing on Indian Lands of Federally Recognized Tribes are eligible for STCS unless their affiliated Tribal Nation has its own TANF and/or CSBG-funded crisis service programs for which the tribal member is eligible.
- a. Members that live outside the boundaries of a Federally Recognized Tribal Nation may be eligible to receive STCS benefits.
 - b. A household may not receive multiple STCS benefits in the same year from the same federally-funded grant program (e.g. TANF, CSBG).
5. To qualify a household for potential benefits, a dependent child must be living with and in the care and physical custody of any of the below:
- a. natural or adoptive parent(s);
 - i. majority custody (over 50%) must be established for one household in situations where both parents are not in the same household. This custody can be established by:
 - a) court order;
 - b) absent a court order, majority physical custody;
 - c) household where child attends school full-time
 - d) IRS child dependent filing arrangement

- 1) qualify for STCS only in a year that parent can claim dependency
 - e) parental written agreement for purposes of this application
 - b. a non-parent relative, which can include:
 - i. stepmother or stepfather;
 - ii. grandparent(s);
 - iii. blood or adoptive: brother, sister, uncle, aunt, first cousin, nephew, niece; and
 - iv. preceding generation persons with prefixes: grand or great or any multiple of these prefixes;
 - v. first cousins once removed; or
 - vi. a spouse of any individual named above, even if death or divorce has terminated the marriage.
 - c. A Legal Permanent Guardian (LPG) may be unrelated by blood or marriage with legal custody awarded by a Court of competent jurisdiction.
6. A household may not be eligible for benefits more than once in a 12-month period;
 7. Two households may not use the same child to qualify for benefits under this policy (although the child may overlap as a household member of multiple households, they cannot be the only eligible child for two households);
 8. A household that has received assistance from TANF Grant Diversion is not eligible for STCS for a period of 120 days after receiving diversion assistance.
 9. Receipt of public rent or utility assistance under the Emergency Rental Assistance Program (ERAP), Arizona Rental Assistance (ARA), Low Income Home Energy Assistance Program (LIHEAP) or Low Income Household Water Assistance Program (LIHWAP) does not disqualify a household from receiving STCS benefits.

E. Verification and Documentation

1. Applicants are required to provide accurate and valid documentation to establish immigration compliance and family demographic eligibility. See Appendix A for a list of official verification documents.

- a. Contractor staff shall verify U.S. Citizenship or Qualified Noncitizen status of at least one minor child in the household.
 - i. copies of documentation must be maintained in the file according to Department retention requirements.
 - ii. See Appendix A for information on documents that can establish immigration status by nature of issuance.
 - b. Contractor staff shall also verify the identity of the applicant for benefits.
 - i. There must be a verifiable non-parent or LPG relationship documented in the case file.
 - ii. Immigration compliance is not an eligibility requirement for the applicant with a qualifying child in the household (see D.1.a. above).
 - c. Agencies may help applicants obtain documents needed for the application.
 - d. As a last resort, after all other efforts have been exhausted to obtain official documentation, a declaratory statement may be made by the applicant, signed, and dated. This statement must provide specific and verifiable information to establish its assertions, specifically addressing the inability to provide required documentation.
- 2. Applicant households must reside in Arizona or use STCS benefits to establish permanent residency in Arizona to qualify for benefits;
 - 3. Contractor is required to maintain copies or images of all documents, affidavits, case notes, and documentation establishing the decision to approve or deny benefits. The documents must be retained in the physical or electronic case file according to the retention guidelines specified in this policy.

F. Financial Qualification Guidelines

- 1. Income Guidelines
 - a. The total gross monthly income of the Applicant's household cannot exceed:
 - i. 125% of [the federal poverty guidelines](#) (FPL); or
 - ii. 150% of [the federal poverty guidelines](#) if the household contains someone who is elderly or has a disability.
 - b. Gross monthly income is required to be calculated for all residents of the household that are:

- i. over 18 years old, and
- ii. 16 and 17 years old if not a full-time high-school student or equivalent.

2. Voluntary Quit or Reduction in Employment

- a. The household is ineligible for STCS if any working member for whom income is countable voluntarily quits or reduces his or her employment within 30 days of the application date without good cause:
 - i. Voluntary quit or reduction in employment includes when a household member, in the preceding 30 days before applying for benefits:
 - a) reduces workload from 30 or more hours per week to less than 30 hours; or
 - b) quits working a job, for which the member regularly worked 20 or more hours per week, without good cause.
 - ii. Voluntary quit or reduction in employment does not include the following involuntary actions:
 - a) Employer-forced quit or reduction of hours;
 - b) Seasonal employment patterns such as migrant farm work;
 - c) Employer layoff or furlough, regardless of whether a return date is set;
 - d) Reduction of workforce; or
 - e) Quitting a job to accept new employment where the new employment fails to materialize or results in layoff through no fault of the employee.
 - f) Terminating a self-employment enterprise
 - iii. Good cause for quitting can include the following:
 - a) care of an ill or incapacitated child or adult Household Member when daycare is inadequate or unavailable;
 - b) lack of adequate childcare for child(ren) under age 12;
 - c) unanticipated emergency;
 - d) sudden loss of available transportation when other options are not feasible;

- e) Inability to write or speak a language necessary for employment;
 - f) serious illness or incapacity of the working Household Member;
 - g) work conditions making employment unreasonable, such as an employer's failure to pay wages;
 - h) resignation by a Household Member under 60 whose employer has recognized as retired;
 - i) the employment is reasonably unsuitable or unsafe;
 - 1) commute more than 2 hours not counting dropoff or pickup of another individual;
 - 2) the working person is no longer able to mentally or physically perform the expected normal duties of the employment;
 - 3) walking to work is unreasonable and no other transportation is available.
- iv. CAA adjudicators should use these guidelines as a basis to determine whether the employment situation of a Household Member falls within the criteria. DES can provide guidance for any scenario not outlined here. CAA should verify with due diligence any situation falling outside standard guidelines.
- b. The CAA Contractor must thoroughly document the case file including steps taken to verify the employment situation that led to the crisis.
3. Gross Monthly Income.
- a. Earned and Unearned Household Income are used to calculate total gross monthly income to determine eligibility based on the FPL criteria above (per VII.E.1.). Gross monthly income includes:
- i. *Earned income*, defined as either cash or in-kind income received as compensation for wages, salaries, commissions or profit through employment or self-employment.
 - a) Earned income is counted effective as of the date it is received or made available to Household Member.
 - ii. *Unearned income* is income that is not received as compensation for a service or earned from sources other than employment as employee or contractor, or in-kind income.
 - a) Unearned income can include:

- 1) regular monthly entitlements including SSI/SSDI, SSA payments (RSDI), and VA benefits;
 - 2) pension or annuity income;
 - 3) welfare benefits including General and Cash Assistance;
 - 4) alimony or spousal maintenance;
 - 5) Bureau of Indian Affairs (BIA) work and cash benefits;
 - 6) work/industrial compensation less attorney fees;
 - 7) Indian gambling disbursements;
 - 8) insurance payments (when not used to repurchase items after a covered loss);
 - 9) interest, dividends, and royalties over \$50 (payments received within 30 days prior to the application are included);
 - 10) legal settlements less attorney and medical fees;
 - 11) mortgage and other sales contracts, including reverse mortgage income;
 - 12) rental income when the owner does not actively manage the property;
 - 13) retirement income sources;
 - 14) unemployment insurance;
 - 15) child support; and
 - 16) partial or total lump-sum payments (except entitlement or welfare lump sums-see below).
- b) Unearned income payments are considered income as of the month the money is intended for payment, regardless of when received; e.g. SSI payment made the week prior to the month for which the benefit is intended is considered income for the intended month; and
- c) A lump sum payment for entitlement benefits is considered income only when all or part of the payment is intended for the current month; e.g. a lump sum payment in January, representing both January and

February, is only considered income for the portion of the payment intended for January.

- b. Income from certain residents in a household are exempt from the household's countable income. These residents include:
 - i. boarders under a written lease agreement;
 - ii. minor children under age 16;
 - iii. earned or unearned income for minors 16 and 17 years old who are full-time high-school students or equivalent;
 - iv. certain domestic violence survivor Applicants:
 - a) in domestic violence separations, the income of the abuser is not counted when the domestic violence is the crisis reason and the abuser is no longer in the household; and
 - b) the Applicant survivor's income is not counted if it is not available to the Applicant (for example, if direct deposit income is in the account of the abuser and the survivor is not able to access the account).
- c. Certain types of income are exempt from countable income. The income sources exempt from the total household income are:
 - i. insurance payments specifically meant to cover specific bills or claimed losses, such as a repair estimate, and cannot be used for other needs;
 - ii. WIC benefits;
 - iii. retirement, pension, or annuity income if it cannot be withdrawn without penalty;
 - iv. BIA work-study program including funds for education and living expenses;
 - v. Federal work-study program benefits;
 - vi. education financial aid, scholarships, or grants used for qualified education expenses, regardless of how the income is used or intended to be used (e.g., student financial aid that may be used for housing expenses is not countable income);
 - vii. earned income of children under 16, regardless of student status;
 - viii. cash gifts of \$50 or less per Household Member;

- ix. non-cash benefits for a Household Member not paid in the Member's name to be used for the household, such as clothing or food vouchers;
- x. loans that need to be repaid;
- xi. money received by a Household Member for the care and maintenance of a person who is not a Household Member;
- xii. payments/vouchers received by the household from the State for the health/well-being of a foster child residing in the household;
- xiii. stipends from senior companion programs - VISTA, Title II, Title V;
- xiv. earned Income Tax Credit and income tax refunds;
- xv. reimbursements - lodging, gas, meals;
- xvi. Agent Orange Payments;
- xvii. Ameri-Corps Network Program payments for living allowances, earnings, and in-kind aid;
- xviii. Federal or State disaster or emergency relief assistance;
- xix. Housing and Urban Development (HUD) benefits or cash allowances when used for the intended purpose;
- xx. Individual Development Account (IDA) deposits - 50% of earned income, up to a maximum of \$100, deposited into IDA;
- xxi. JobStart participation earnings;
- xxii. Workforce Investment Act (WIA) earnings; and
- xxiii. reimbursement of training related expenses from programs including Fair Labor Standards Act (FLSA) and Unpaid Work Experience (UWE) for Jobs participants.

4. Verification of income

- a. Earned income can be verified using any of the following:
 - i. paystub or check stub showing gross earnings;
 - ii. employment verification or signed/dated letter from the employer;
 - a) that must include:
 - 1) name, address, and phone number of the employer;

- 2) frequency of pay periods;
 - 3) gross pay amount (hourly, salary, etc.);
 - 4) day of week pay is received by the employee;
 - b) and should not be used when it may jeopardize the employment of the applicant; and
 - iii. a letter from an agency providing government-sponsored training;
 - iv. an offer letter from the current employer when the employee has not yet received the first wage payment;
 - v. self-employment income records;
 - vi. collateral contact; or
 - a) Collateral contact is a verbal attempt to verify the information provided by an applicant. A collateral contact may be from an agency, an organization, or an individual otherwise qualified to have knowledge of the required information.
 - vii. a client's statement, when all other proofs are unavailable and all attempts have been made to secure verification, with an explanation of why the proofs are unavailable.
- b. Unearned income can be verified using any of the following:
- i. assistance benefits payment records;
 - ii. an award letter for entitlement programs;
 - iii. court records, clerk of court documents;
 - iv. Division of Child Support Services (DCSS) printouts;
 - v. current check when it includes gross income (federal checks should not be photocopied);
 - vi. collateral contact
 - vii. a signed statement from the agency or payer of funds; or
 - viii. a client's statement, when all other proofs are unavailable and all attempts have been made to secure verification, with an explanation of why the proofs are unavailable.
- c. Verification of No Income
- i. A written and signed certification of no income is required for any household member that has no income and is:

- a) 18 years of age or older; or
 - b) 16 or 17 years of age and not a full-time student or equivalent.
- ii. The certification of no income must include:
- a) The last day worked or paid;
 - b) The last source of income;
 - c) All gross income received in the income request period;
 - d) The Household member's signature; and
 - e) A certification that:
 - 1) The information provided in is true, accurate, and correct;
 - 2) The individual does in fact have no income; and
 - 3) Providing false information may subject the individual to denial, disqualification, recoupment of benefits, and civil and/or criminal penalties.

G. Income Calculations

1. The household's total gross monthly income for the 30 days prior to and including the application date will be calculated by:
 - a. Totaling gross earned and unearned income for each Household Member;
 - b. Including all pay dates falling within the 30-day period and amount of gross income; and
 - c. Comparing the total gross household income for the period to the FPL that is appropriate for the household demographics.
2. The application for STCS benefits cannot be denied due solely to a lack of resources to sustain the future needs of the household.
 - a. If a household has been meeting its needs without verifiable income sources, the case manager should explore additional sources the family may be using; and
 - b. An affidavit signed by the applicant can be accepted as a last resort, if all efforts to determine benefits and resources have been exhausted and unusual circumstances prevent the acquisition or verification of information.

H. Crisis Qualifications

1. An eligible household must be experiencing, or expecting to experience within 30 days from the application date, homelessness or an interruption of heating or cooling.
2. Crisis benefits can include:
 - a. Housing assistance or utility assistance benefits;
 - b. Job-related assistance may be provided as a means to help sustain the household temporarily; and
 - c. Benefits to establish a permanent residence (lease or rental agreement), if the Household:
 - i. is verifiably homeless;
 - ii. has a valid child Household member as defined above; and
 - iii. the CAA can reasonably determine that the household will be able to independently sustain the home once the move-in assistance is provided.
3. The crisis must be documented by any of the following proofs:
 - a. an eviction or foreclosure notice;
 - b. a shutoff or delinquency notice from a utility provider;
 - i. a household in arrears for more than 5 days during a shutoff moratorium may qualify for benefits;
 - ii. benefits can be paid during a moratorium period;
 - c. a statement from a mortgage holder or a landlord (e.g. 5-day notice) verifying the household is behind on their payment;
 - d. residence in a shelter, vehicle, or other evidence of homelessness; or
 - e. evidence of job-related instability and a plan to rectify the situation.
4. The crisis must have been caused by one of the following emergency conditions within 90 days of the application date:
 - a. a separation of the family due to domestic violence;
 - b. a loss of income;
 - c. unforeseen circumstances that increase a household's unplanned expenditures and it is impossible to meet future budgeted expenditures without assistance;

- d. a condition that reasonably endangers the health or safety of an applicant household or member including:
 - i. lead poisoning;
 - ii. condemned property;
 - iii. asbestos in the home, established by official testing;
 - iv. infestation by rodents, roaches, vermin; or
 - v. a verified medical condition related to the housing or utility instability;
 - e. special needs expenses necessary to secure or maintain employment, e.g. tools or equipment needed for employment and vouchers for transportation expenses.
5. It is the responsibility of the CAA to determine the legitimacy of the cause of the crisis and its relationship to the Client's current need for benefit assistance.
- a. The caseworker will review, verify, and document any evidence supporting the crisis;
 - b. The cause of the crisis must have occurred within 90 days of the application date; and
 - c. The crisis must directly and reasonably affect the ability of the client household to meet its current or immediate future obligations.

I. Benefit Limits

- 1. CAA may only distribute benefits up to the following maximum allowances:
 - a. Temporary shelter (e.g. hotel) may not exceed 7 days or \$700;
 - b. Housing assistance (other than temporary) may not exceed \$4,200;
 - c. Utility assistance may not exceed \$1,000 and cannot be paid for an amount greater than the outstanding balance(s) of the utility bill(s), except for payment of a utility deposit subject to this limit; and
 - d. Employment assistance may not exceed \$500.
- 2. A STCS benefit can only be provided once per Eligibility Period, regardless of the benefit amount or whether the maximum benefit was received. An Applicant is eligible to re-apply during the following eligibility period.
 - a. Example: Applicant applies for STCS on January 1, 2024, and is approved for \$3,000 in housing assistance on January 10, 2024. Applicant's Eligibility Period begins January 10, 2024, and runs through January 9, 2025. The Applicant may not re-apply for STCS

during their current Eligibility Period but may apply for STCS benefits during their next Eligibility Period starting January 10, 2025 (Note: The next Eligibility Period will be based upon the new application approval date).

J. Deciding a Case

1. CAA must adjudicate an application and make a final decision to the applicant indicating approval or denial of STCS benefits within **15** business days of the application date.
2. CAA's should make all reasonable efforts to assist the Applicant with obtaining documentation and/or information required to receive emergency benefits with the understanding that time is of the essence in processing applications and disbursing benefits for STCS crises.
 - a. If an application is missing necessary information despite best efforts of the Contractor to adjudicate the application and confirm eligibility, such as in cases when incomplete documentation/information is provided, or communication is lost with an applicant, a timely case decision is still required.
 - b. After the 15 business day processing period has passed, the Contractor should deny the application, with a disposition reason as 'Incomplete' or 'Missing Documentation'. Follow the *Decision Notices to Applicants* procedures, below.
3. All documents obtained during the intake and application process must be retained, whether the application is completed or not.

K. Decision Notices to Applicants

1. Program decision notices must be issued to the applicant within one business day of the decision.
 - a. Approval Notices. Approval notices will be issued when the decision is made to grant benefits. An approval notice will include;
 - a) The date of the decision;
 - b) The amount of the benefit; and
 - c) The Applicant's grievance rights.
 - b. Denial Notices. Denial notices will be issued when the decision is made to deny benefits due to ineligibility, missing documentation (e.g. 'Incomplete'), or another reason. Denial notices will include:
 - a) The date of the decision;
 - b) The basis of the denial; and
 - c) The Applicant's grievance rights.

2. A copy of all decision notices will be retained by the Contractor/Program in accordance with DES Records Retention Schedules.
3. If upon the conclusion of the application processing period, the CAA is unable to make a benefits decision due to missing documentation or incomplete information, an application will be denied (e.g. such as a disposition of 'Incomplete');
 - a. Applicants whose applications are denied as 'Incomplete' may reapply for benefits at any time and are not adversely affected by the denial.
4. Deciding a case provides a point of closure for all Applicants and cases, and commences a period of time for the Applicant to file a potential grievance for an unfavorable decision.

L. Disbursement of Benefits

1. Regardless of the benefit amount the client is awarded, STCS benefits may only be awarded once in a twelve consecutive month period, which begins on the eligibility date determined by the Contracted agency. Clients must meet all eligibility criteria.
2. Benefits must be disbursed timely after benefits are approved.
 - a. CAA is expected to maintain a payment disbursement system that includes electronic funds transfer to Utility providers and vendors, landlords, et cetera, or the ability to distribute and coordinate a voucher system; and
 - b. CAA issues direct payments and is reimbursed through the DES/DCAD contract invoice process.
 - c. Financial records are required to be maintained according to Division retention schedules.

M. Grievances

1. CAAs must have a documented grievance procedure in place, which is available to an Applicant upon request. The grievance process must allow for an Applicant to attempt to resolve complaints at the local level in an informal manner.
 - a. Applicants will first follow the CAA grievance process for grievance resolution.
 - b. If the Applicant's grievance is not resolved in full, the Applicant may request a review of the contractor's decision by DES.
2. Notice of an Applicant's right to file a grievance must be provided:
 - a. On any Contractor website available to the public about the Program;

- b. In writing at the time of application; and
 - c. On all approval and denial benefit decision notices.
3. The CAA grievance processes shall, at a minimum:
- a. Consider grievances based upon a preponderance of the evidence standard. This standard considers whether it is more likely than not that the decision made was correct. This decision must be based on Program policy guidelines, contractual requirements, and relevant Arizona statutes;
 - b. Provide the Applicant an opportunity to be heard or to provide additional evidence which supports the application as part of the grievance process;
 - c. Accept the submission of Applicant grievances for no less than 10 calendar days of the date of the decision letter;
 - d. Issue a written grievance decision notice affirming or amending the original benefits adjudication decision or amount within 15 calendar days of receipt of grievance; and
 - e. Provide notice of the Applicant's right to request review of the CAA decision by DES if the grievance is not granted in full.
4. Request for DES Grievance Review
- a. Applicants may request Reconsideration by DES of any final Adverse Action or benefits determination made by a CAA. An adverse action or benefits decision is final when the Applicant has exhausted the CAA Grievance process. Grievances will be processed in accordance with the DCAD Grievances Policy.

N. Program Monitoring and Audits

1. Program monitoring and formal audits generally consist of evaluations of internal processes and procedures for compliance with all requirements of federal, state, and local laws, CAA-Division contracts, and this Policy.
- a. CAAs will be audited a minimum of once every three (3) years, focusing on program, fiscal, policy, citizenship compliance, and general contract compliance.
 - b. Ongoing monitoring will be performed in accordance with the contract/monitoring policy at the Division level.
2. Contractors and Subcontractors
- a. Contractors will ensure regular monitoring and compliance of any subcontractors which provide services on behalf of the Contractor in

the completion of Program services for provision to DES, which may include:

- i. Regular site visit audits of vendors and Subcontractors;
- ii. Established written procedures for carrying out contracted work or the provision of services by vendors;
- iii. Regular reporting schedules with any subcontractors for any reports, data, or other information required to be provided to DES, so such information is available upon request; and
- iv. Evidence of quarterly meeting cadence and regular communication efforts regarding program standards, performance, and expectations.

3. Annual Reporting

- a. An annual accounting report of all collections, expenses, and disbursements must be prepared after each Fiscal Year and:
 - i. The DES Director must submit this report to the State legislative committee by October 15 following the end of the fiscal year.
 - ii. Other information may be requested by the legislature and is due at the same time.

O. Confidentiality

1. Information collected by the Program and during any grievance is confidential under A.R.S. § 41-1959 unless such confidentiality is waived.
2. The State of Arizona DES, DCAD, Auditor General's Office, Arizona Courts, and the Office of Inspector General (OIG), or authorized representatives of either, shall have the right of access to confidential records to conduct audits or investigations.

P. Welfare Fraud Prevention and Penalty

1. Employees and Contractors will take multiple steps to detect and prevent instances of Welfare Fraud. Specifically, Employees will review the application documents for signs of fraud.
2. Applicants are required to attest they are not receiving benefits under STCS for any expenses already paid by any other assistance program. Providing false statements may be punishable by law and/or result in denial or disqualification from STCS benefits.
3. In cases where potential Welfare Fraud is detected, Employees and Contractors will document the suspected nature of the fraud, any relevant

information (e.g., known facts, statements, witnesses, or other knowledge possessed by the employee regarding the matter) and refer the matter to the Office of the Inspector General for investigation.

4. When Welfare Fraud is detected, external parties shall:
 - a) Call the DES Fraud Hotline at (800) 251-2436; or
 - b) Complete the online [Fraud Reporting Form](#).
5. If DES determines that an Applicant has committed an intentional program violation or defrauded STCS, the Applicant will be subject to denial of STCS benefits, disqualification from the Program, and criminal prosecution.
 - a) Applicants are subject to 12-month disqualification for a 1st violation, 24-month disqualification for a 2nd violation, and permanent disqualification for a 3rd violation.

APPENDIX A - Identity and Immigration Status Verification

VERIFICATION OF U.S. CITIZENSHIP DOCUMENTS

Arizona Revised Statutes, Section 46-140.01, requires local governments and agents to verify the identity and citizenship and/or immigration status of persons applying to receive benefits provided with State funds. Most federally-funded programs also require verification of identity and/or citizenship of one or more family members.

Original documents, as listed below, are compliant with immigration verification requirements and screened for compliance by the issuing agency as part of the document's application process.

Acceptable documents to verify U.S. citizenship and identity issued by the U.S. government include, but are not limited to, the following:

- REAL ID-compliant Driver's License or Identification Card issued by any State within the U.S.
- Certified birth certificate issued by a U.S., state, or local governmental bureau of vital statistics.
- Certificate of Birth (Form FS-545 or DS-1350).
- American Indian census record. The tribal boundaries of a federally recognized United States Native American Indian Tribe may extend into a foreign country. Treat enrolled members of that tribe born outside the United States the same as a citizen of the United States.
- Certificate of Naturalization (Form N-550 OR N-570).
- Report of Birth Abroad of a U.S. Citizen (Form FS 240).
- Certificate of U.S. Citizenship (Form N-560 or N-561).
- United States Citizen Identification Card (Form I-197) or Identification Card for Use of Resident Citizen (I-179).
- U.S. Passport or Passport Card.
- Verification from the United States Citizenship and Immigration Services (USCIS).
- Verification from the Social Security Administration (SSA).
- Cuban or Haitian Entrants who have fled to the U.S. from either Cuba or Haiti to escape oppression, persecution, national distress, or environmental disasters are considered qualified noncitizens under Section 501(e) of the Refugee Education and Assistance Act (REAA) of 1980 and are eligible for STCS if all other criteria are met.