

DEPARTMENT OF HUMAN SERVICES FAMILY INVESTMENT ADMINISTRATION	TEMPORARY CASH ASSISTANCE MANUAL	
FAMILY INDEPENDENCE PLAN - 205	COMAR 07.03.03.04	SECTION 200

Pursuant to the Maryland Code Annotated, Human Services § 5-301(c) and COMAR 07.03.03.02B(24), the acronym "FIP" is formally defined as the "Family Investment Program."

Notwithstanding this statutory definition, within LDSS operations, "FIP" is also widely used to denote the "Family Independence Plan." For this TCA Manual, "FIP" shall refer to the Family Independence Plan unless context or specific legal citations dictate otherwise.

The FIP is the most important step in helping customers to achieve self-sufficiency. The FIP plan tells the case manager and the customer where the customer is going and how the customer is going to get there. Leaving any portion of the FIP plan incomplete will likely hinder and delay the customer's success. The FIP plan is developed by the case manager and the customer together and after the completion of the Assessment.

205.1 Definitions

1. **Good faith effort** means the customer has made every effort to meet the terms outlined for the customer in the FIP.
2. **Supportive services** are services provided to the TCA family based on the assessed needs of the customer by the local department or through referrals to service providers (such as: counseling, the Social Services Administration, vocational rehabilitation referral, education, training and other evaluations).
3. **Work eligible individuals** (WEI) are the individuals applying for or receiving TCA benefits that are required to be counted in the federal work participation rate.
 - a. Long-term disabled customers are now counted in the federal work participation rate and should be offered supportive services to enable them to become self-sufficient.
4. **Good cause (child support noncooperation)** means circumstances exist in which the customer's cooperation with child support may be against the best interest of the child. The FIP determines whether a customer has good cause for child support noncooperation, using the criteria in "Good Cause and Adequate Reason for Child Support Noncooperation," below.

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5. **Adequate reason (child support noncooperation)** means circumstances beyond the customer's control that justify noncooperation with child support. The Child Support Administration (formerly the Child Support Enforcement Agency) determines whether a customer has adequate reason, using the criteria in "Good Cause and Adequate Reason for Child Support Noncooperation," below.

205.2 The Family Independence Plan (FIP)

1. The customer and case manager complete the FIP together after the assessment has been completed. The completed assessment helps to build the FIP. The completed FIP must be signed by the case manager and the head of household on the TCA case.
2. The primary adult (head of household) in a two parent household is required to sign the FIP.
3. If the applicant or customer is a caretaker relative who is not needy and is not financially responsible for the children, the focus of the FIP is on the needs of the children and the resources available to them.
 - a. The needs of the caretaker relative should be assessed with respect to the caretaker's ability to care for the children.
 - b. If the caretaker chooses to voluntarily participate in the work activity program it should be noted on the FIP.
4. The FIP contains:
 1. A statement of the customer's or family's goals and the intent of the Plan Helping customers identify and define their ambitions and build confidence in their ability to succeed is a key part of the process.
 - One of the **goals** of the FIP is to help customers develop and strive for attainable goals.
 - Goals for children in the household should focus on areas such as education, school attendance, early childhood development, and healthcare.
 2. Activities and other actions the customer/family is expected to participate in or complete such as:
 - a. Work Activities:
 - Job search;

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- Employment or training;
 - Community service;
 - Education;
 - Medical & disability; and
 - Legal-related actions
- b. Child Support:
- Filing for child support, and
 - Keeping all appointments for the child support process
 - Claiming good cause or adequate reason not to cooperate with child support, if applicable (see “Good Cause and Adequate Reason for Child Support Noncooperation,” below).
- c. Substance use disorder treatment.
- d. Filing for all benefits the family may be potentially eligible to receive This is not an exhaustive list: (e.g., unemployment benefits, death benefits, social security disability benefits)
3. The supportive services the local department is expected to provide to the family such as:
- Child Care Scholarship;
 - Transportation assistance;
 - Counseling;
 - Reasonable accommodations; and
 - Expungement and bonding assistance.

205.3 Completing, Reviewing and Updating the FIP

1. Complete the initial FIP at application.
2. Acceptable signatures can include a wet-ink signature, an electronic signature, a typed name as a signature, and a signature drawn using a mouse, stylus, or touch-screen signature.
3. To foster strong customer rapport and yield more effective FIPs, staff should integrate the Substance Abuse and Mental Health Services Administration’s (SAMHSA) six principles of trauma-informed care when conducting assessment reviews:
 - a. Ensuring physical and emotional safety;
 - b. Establishing trustworthiness and transparency in care;
 - c. Allowing for peer support between beneficiaries;

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- d. Incorporating collaboration and mutuality into decision making;
 - e. Fostering empowerment, voice, and choice among beneficiaries and staff;
 - f. Practicing sensitivity to cultural, historical, and gender differences.
- 4. The case manager must complete and upload the completed FIP to Eligibility and Enrollment (E&E) ECM Case Documents within three business days of receiving the signed document.
- 5. Update the FIP at redetermination, interim change, or whenever significant shifts occur within the household, such as the onset of a disability or a change in work activities and employment status. For additional examples of significant shifts refer to Section 0213 of TCA Manual.
- 6. Review and update the assessment when the customer/household reaches 42-48 months of TCA. This should be completed no later than the end of month 49 (see Section 313 of the TCA Manual).
- 7. Review and update the assessment when the customer/household reaches 58, 59, and 60 months of TCA (see Section 0313 of the TCA Manual).
- 8. If a hardship exemption has been granted or extended, the FIP must be updated/reviewed every six months. (See Section 0313 of the TCA Manual.)
- 9. The case manager may schedule interim appointments between recertifications that include a review and update of the FIP and amendments to the FIP as needed.
- 10. An updated FIP must include the status of:
 - a. Safety and immediate needs check;
 - b. All past and updated assessments;
 - c. Information regarding customer disabilities and accommodations;
 - d. Information on limited English proficiency, if applicable;
 - e. Information on counseling referrals, acceptance, or refusal;
 - f. Social Services referrals and support offered, accepted or refused;
 - g. Other supportive services offered, accepted or refused;
 - h. Testing;
 - i. Education programs referred, accepted or refused;
 - j. Job search history;
 - k. Job training history;
 - l. Work experience;
 - m. Employment;
 - n. History of family violence; and
 - o. History of substance use disorder ;

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- p. Action items for the customer and local department.

Reminder: The TCA time limit counter stops during any month(s) in which the customer has reported domestic or family violence.

205.3 Compliance with the FIP

1. Customers develop the FIP with the case manager and agree to follow it.
2. Non-compliance with the FIP includes:
 - a. Failure to provide required verification;
 - b. Refusal to sign required forms;
 - c. Failure or refusal to cooperate with the assigned work program or work activity;
 - d. Not following the steps and referrals set in the FIP; and
 - e. Missing scheduled appointments.

Good Cause and Adequate Reason for Child Support Noncooperation

Effective October 1, 2026 (HB 1490 / Chapter 763, Acts of 2026), a customer's TCA case may not be denied, reduced, or terminated for noncooperation with child support if the customer has good cause or an adequate reason. These are two separate determinations, made by different entities:

1. **Good cause** is determined by the FIP (the local department). The FIP must find good cause if circumstances exist in which the customer's cooperation with child support may be against the best interest of the child.
2. **Adequate reason** is determined by the Child Support Administration (formerly the Child Support Enforcement Agency), based on circumstances beyond the customer's control.
3. **Good cause criteria** – the FIP must find good cause if the customer states that cooperation risks physical or emotional harm to, or retaliation against, the child or the relative with whom the child resides; the child was conceived as a result of incest or rape; adoption proceedings for the child are pending or under consideration; or cooperation risks discouraging a noncustodial parent from maintaining a relationship with the child or providing emotional or other support.

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4. **Adequate reason criteria** – the Child Support Administration must find adequate reason for circumstances beyond the customer’s control, including Child Support Administration mail sent to an incorrect address; a natural disaster or civil disorder; critical illness; a family crisis requiring the customer’s full attention; or travel away from home during the period notices were mailed or appointments were scheduled.
5. **Proving good cause or adequate reason** – a customer is not required to produce written evidence or third-party verification. An oral or written statement from the customer is sufficient. If the statement is oral, the case manager must document it. If the customer needs help, the case manager must assist in preparing a written statement or documenting an oral statement, using the standardized good cause form. A written statement may not be required to be notarized or put in a format that imposes a cost on the customer.
6. **No contact with the noncustodial parent** – in the process of granting good cause, a case manager may not contact the noncustodial parent from whom support would be sought.
7. **Required notice** – before referring a customer to the Child Support Administration during the application and certification process, the case manager must notify the customer of the availability of child support pass-through and disregard; the right to claim good cause, the criteria for it, and the timeframe and process for requesting it; and that a case manager can help with requesting good cause. This notice must be given in writing on the application, orally during phone or in-person interviews, and in all written FIP notices about child support compliance or noncompliance. The case manager must also offer assistance in requesting good cause and give the customer an opportunity to claim it.
8. **Timing** – a customer may request and receive a good cause or adequate reason determination at any time during the application and certification period, not only at intake.
9. **Missing information** – if a customer does not provide requested child support information, the case manager must tell the customer they may attest to the lack of information and must offer help preparing the attestation. A customer who attests to lacking the information is considered to be in cooperation with child support.

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205.4 Penalty for Non-Compliance with the FIP

1. If a customer does not have a signed and completed FIP at application, deny the case 566
2. If an active TCA customer is non-compliant and doesn't have a signed FIP, close the case with the 566 code.
3. If a customer is non-compliant with the signed FIP, the active TCA case should be placed in conciliation and a sanction imposed if the customer does not have good cause or become compliant within the conciliation period.
4. If the customer had an active hardship exemption, the hardship exemption ends once the customer is determined non-compliant with the FIP. Close the case 510 and 566 if the customer is non-compliant with the FIP.
5. If an adult member or minor parent is noncompliant with child support requirements and does not have good cause or an adequate reason, the local department must impose a 25% reduction of the entire TCA grant amount.

Examples

- Example 1. Carol Carroll applies for herself and her sons, Dan, 1 month old, and David, 2 years old. The father of her children left the home a week after Dan was born. Ms. Carroll took a secretarial course in high school, but has no work experience. Ms. Carroll wants to go to work as soon as possible, but thinks she should stay home until Dan is at least 6 months old. Ms. Carroll's FIP agreement acknowledges that she has a child under 1 exemption for 11 months but wants to participate sooner. The FIP also acknowledges that Ms. Carroll will be required to participate for only 20 hours per week, although she may participate more. It states that she will:
- File for child support for both children now;
 - Attend appointments with the child support staff and attend any child support hearings ;
 - In the month that Dan turns 6 months old,
 - o Call the child care resource line for child care facilities in her area;
 - o Check out child care providers in her area; and

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- o Locate child care for both children.
- Practice on her mother's computer every week; and
- Attend interim appointments, if scheduled by the case manager, to review compliance with the agreement.

Example 2. Ms. Carroll comes to see the case manager when Dan is 6 months old. She indicates she wants to get a job as soon as possible. A child support order was established for both boys, and their father is paying support. She has 5 months left on her exemption. Her FIP is updated as follows:

- Ms. Carroll will:
 - o Select a day care provider;
 - o Attend the local department's job search class;
 - o Attend a computer class;
 - o Look for an office job; and
 - o Accept a job that is compatible with available child care and transportation.
- The local department will assist her in:
 - o Applying for the Child Care Scholarship;
 - o Obtaining a transportation allowance during training; and
 - o Referring her to any other services as needed.