

SANCTIONS AND TERMINATION OF SERVICES POLICY FOR CO-SPONSORED CLIENTS

Version 1.0
September 2019

While most IRIS clients make a good faith effort to achieve self-sufficiency and cooperate with IRIS, on occasion clients refuse to comply with program requirements or behave in a manner that is disrespectful to IRIS (staff, interns, volunteers or other clients) or that hinders their achievement of self-sufficiency. As explained in IRIS' General Statement of Mutual Rights and Responsibilities, there are limits to IRIS' responsibility to support clients, and in situations where clients refuse to meet expectations, IRIS has the right to limit and/or terminate services after appropriate consultation with your co-sponsor. A Co-Sponsor group can also choose to limit or terminate support.

Sanctions serve as an incentive for clients to become compliant. Every effort should be made during the sanctioning procedure to utilize the situation as a learning experience for clients and enable the clients to choose to comply with expectations and resume their engagement with IRIS and their co-sponsors and their path towards self-sufficiency.

IRIS must comply with all federal and state funded and mandated programs (R&P, TFA, RCA, PC, RSS, etc.). Any sanctions imposed will not conflict with the requirements related to these grants.

Non-Compliant Behaviors

The following are punishable examples of non-compliant behaviors:

Minor offenses:

- Repeatedly missing appointments with IRIS staff, interns or volunteers including co-sponsors (at least twice)
- Repeatedly missing ESOL and/or job readiness classes (at least twice)
- Refusing to acknowledge receipt of (sign receipts related to) services provided
- Refusing to repay loans from IRIS
- Showing disrespect to IRIS staff, interns, volunteers, co-sponsors or other clients through verbal insults or other non-physical action including ignoring requests made by IRIS staff, interns or volunteers

Intermediate offenses:

- Refusing a job offer
- Quitting a job
 - Quitting is acceptable if:
 - The employer is given two weeks' notice, and:
 - The client has an unavoidable conflict (such as childcare, health issues, spouse's job, etc.), or:
 - IRIS Employment has evidence that the client has been mistreated by the employer
- Refusing to pay rent (at least the amount of rent determined by IRIS to be appropriate)

Major offenses:

- Refusing to pay the amount of rent determined by IRIS to be appropriate (more than 3 times)

- Breaking a lease agreement (moving from an apartment provided by an IRIS co-sponsor before the end of the lease agreement without approval from IRIS, even if the client has not signed the lease)
- Physically harming (or threatening to physically harm) an IRIS staff member, intern, volunteer, co-sponsor or other client

Clients who engage in these types of behaviors will be sanctioned as described below:

Sanctions

After a minor offense, an IRIS staff member or your IRIS Co-Sponsor will issue:

Official verbal warning - This is a formal conversation with the client discussing non-compliant behavior. It explains to the client the nature of the violation, the remedial action required, and the consequences of failing to remedy the violation as well as actions that will happen if behavior is repeated. Details of this conversation will be provided in case notes supplied by the co-sponsor to the IRIS case manager. Whenever possible, this warning should be given in person in the client's home with a witness present. If it is not possible it can be given by phone/text, as a voice mail message if the client refuses to answer. In the case of disrespect, the warning should come from the co-sponsor (co)chair of the volunteer who was disrespected. The (co)chair has to use their best judgment to determine whether the disrespect was serious enough to be objectively considered an offense.

After 2 minor offenses, an IRIS staff member will issue:

Official Written Warning – The written warning states the nature of the violation, the remedial action required, and the consequences of failing to remedy the violation as well as actions that will happen if behavior is repeated. This document will be discussed with and given to the client and a copy will be filed in the case file by the case manager at IRIS. Whenever possible, this warning should be given in person at the client home with a witness present. If it is not possible, it can be sent by email or post.

After an intermediate offense, there will be a partial sanction in the form of temporary ineligibility for assistance as well as a written warning.

Financial assistance sanctions – IRIS expectations of how much a client should be paying towards rent are explained in the Financial Assistance Policy and are discussed between each client, co-sponsor and client each month. If a client does not pay the amount set by IRIS (an intermediate offense), IRIS will issue a written warning and consider the client temporarily ineligible for any financial assistance. (If obligated to do so by a lease agreement, the co-sponsor will cover the difference in rent in the form of a loan that the client is expected to repay (whether a loan agreement is signed or not).

Escalation – If a client commits minor or intermediate offenses on a repeated basis, a member of the Management Team can escalate the issue to the level of a major offense and determine that the client is immediately ineligible for certain services

After a major offense, services are immediately terminated for a given period of time or until some reparation is done (full sanction). A letter from IRIS explaining this termination of services and any required reparations must be provided by the co-sponsor to the client, in person if possible.

It should be noted that services that IRIS is specifically mandated to provide to all refugees will not be terminated. Further, IRIS will not terminate services related to children's education or family reunification.

Financial assistance sanctions – If a client refuses to pay the set amount of rent 3 times or if the client breaks the lease without IRIS approval then the client becomes ineligible for any financial assistance from IRIS or the co-sponsor, even if this eventually leads to his/her eviction. The client must also repay any related expense that IRIS or the co-sponsor incurs on the client's behalf (rent, damages, garbage removal, etc.). Client will be ineligible for all case management services other than the required

minimums/referrals until he/she pays back at least half of the incurred expenses. The client will be permanently ineligible for financial assistance.

After an intermediate or major offense, the client will be given the opportunity to set up a meeting with the Executive Director to appeal the sanctioning.

Sanction decisions should be communicated to the client in writing.