



Family Trust Program Termination Policy

1) Purpose

To set a clear and fair process for rare circumstances when a Family Trust participant's Family Investments must be suspended or terminated. This policy will center the participant's dignity, safety, and choice while ensuring program integrity and legal compliance.

Family Trust will avoid terminating participants whenever possible. Termination is a last resort after supportive responses and due process have been exhausted, except for immediate safety risks where short emergency pauses may be initiated pending review.

2) Guiding Principles

- **Strengths-based & dignity-first:** Assume capability of family and good intent; focus on supports over sanctions.
- **Trauma-informed:** Prioritize safety, transparency, collaboration, peer support, empowerment, and familial circumstances in all steps.
- **Fairness & accessibility:** Provide language access, disability accommodations, and flexible communications to prevent unfair impacts.
- **Harm reduction:** Address issues with the least restrictive response (coaching, accommodation, temporary suspension) before termination.
- **Due process & transparency:** Provide written notice, an impartial review, and a clear path to reinstatement when possible.
- **No forced exits to crisis:** When issues arise, coordinate warm handoffs and safety planning; termination should not precipitate homelessness or crisis.

3) Scope & Definitions

- **Applies to:** All participants receiving DCT payments and support services.
- **Supportive response:** Coaching, problem-solving, reasonable accommodation, safety planning, or referrals.
- **Suspension:** *Temporary pause* of benefits while an issue is reviewed or a safety plan is implemented.
- **Termination:** Permanent suspension of benefits for the remainder of the program term (with a path to future re-enrollment when appropriate).



4) Support-First Approach (Prior to Any Termination)

Before any termination is considered (except for immediate safety threats requiring a short emergency suspension pending review), staff will:

- **Attempt Contact & Coach:** Contact the participant in their preferred format to explore stressors, barriers, and safety concerns.
- **Reasonable accommodations:** Offer language access, accessibility support, flexible scheduling, alternate payment methods (card, ACH, mobile wallet), and alternate trusted contact options.
- **Safety planning:** If safety is the concern, co-create a plan to reduce risk without ending benefits.
- **Integrity supports:** For suspected fraud/impersonation, use proportionate checks (ID re-verification) and clearly explain rights and processes.
- **Benefits-interaction review:** Offer counseling on benefits cliffs, reporting obligations (as applicable), and legal resources.

5) Grounds for Suspension or Termination

Only the following, narrowly defined circumstances may lead to *suspension or termination*:

1. **Credible, documented safety risk** to staff, participants, or the public (e.g., threats of serious harm or violence).
2. **Verified fraud or material misrepresentation** directly tied to program enrollment or payments (e.g., identity theft, organized impersonation), established through a fair inquiry with the participant's opportunity to respond.
3. **Legal ineligibility** which arises after enrollment and requires that the program remedies the situation, (e.g., persistent inability to legally receive payments by any available mechanism despite program assistance) or following participant incarceration or death where no eligible designee of payments was assigned
4. **Participant requests** for withdrawal (voluntary termination).
5. **Program wind-down** (end of pilot term or funding), communicated with ample notice and resource referrals; wind-down is **not** participant-fault termination.
6. **Failure to comply with required check-ins and survey completion**
 - a. To ensure uninterrupted payments and participant safety, Family Trust will require check-ins (e.g., by phone/text/video/in-person) **at a minimum once per month** for the purpose of verifying contact details, confirming receipt of funds,



offering optional supports, and seeking updates on stabilization journey. Participation in case management or services is **not required** for continued receipt of funds.

6) Due Process (Notice, Review, Decision)

The Project will always provide due process:

- **Rules upfront:** Give participants a plain-language summary of program rules, this policy, and payment terms before benefits start.
- **Written notice:** If suspension/termination is proposed, provide timely written notice stating the specific reasons and supportive steps already attempted.
- **Impartial review:** Provide at least 30 days for a review/appeal to a neutral reviewer not involved in the original decision; allow oral or written statements and supporting materials; offer language access and accommodations.
- **Prompt final decision:** Provide a prompt written decision (defined as within 5 business days after the review concludes).

8) Emergency Safety Suspensions

If there is a credible, immediate threat of serious harm, the Project Manager may authorize a short emergency suspension (up to 10 business days) to complete safety planning and review. The participant receives same-day notice explaining the reason, expected timeline, supports offered, and review rights.

9) Reinstatement & Future Eligibility

- Participants terminated for non-safety reasons may be reinstated upon resolving the cause (e.g., successful ID re-verification, payment channel restored).
- Termination will **not** bar future enrollment or participation in subsequent cohorts, unless a serious, unresolved safety risk remains.

10) Participant Supports at Suspension/Termination

- **Warm handoffs** to community resources (rent/utility aid, legal aid, advocacy, survivor services).
- **Clear communication** of the last disbursement date, and any allowable transition support.



- **Non-retaliation & confidentiality** protections reiterated in writing.

11) Documentation & Data Protection

- Family Trust will document outreach, accommodations offered, safety planning, and review outcomes in secure systems.
- Family Trust will limit data collection to what is necessary to protect survivor safety and sensitive information.

12) Staff Training & Quality Assurance

- Train staff in trauma-informed care, de-escalation, disability rights, language access, and fraud-safeguarding basics relevant to cash delivery.
- Conduct quarterly audits of suspension/termination cases to check the impacts of policy regarding fidelity to our values; publish de-identified, aggregate metrics.

1. One-Page Participant Version: [Family Trust Termination Procedure](#) (PDF)

2. Notice of Proposed Suspension/Termination: [Notice of Proposed Suspension_Termination](#)

3.— Appeal / Review Request Form: [Appeal_Review Request Form](#) (PDF)

4. Template C — Final Decision Notice: [Final Decision Notice](#)