Field Operations Memo 2004-37
September 22, 2004

To:	**Transitional Assistance Office Staff**
From:	**Cescia Derderian, Assistant Commissioner for Field Operations**
Re:	**TAFDC – Work Program Requirement Expansion (Phase II)**

Background

Field Operations Memo 2004-27 told TAO Staff about:

- an initial mailing to recipients about changes to the Work Program requirement;

- how to process certain recipients who will meet the education or training activity of the Work Program requirement;

Field Operations Memo 2004-37 A tells TAO Staff about the revised Work Program requirement sanction process and expanded good cause reasons; and

Field Operations Memo 2004-37 B tells TAO Staff about a "Meets Compliance" clean-up project.

Purpose of Memo

This memo informs AU Managers:

- about a follow-up mailing to this population;

- about the Work Program requirement changes;

- how to process nonexempt recipients impacted by these changes; and

- how to process new applications as of September 27, 2004.

Regulations   State Letter 1284 transmits changes to the Work Program Policy, effective
September 27, 2004.

Obsolete Field   This Field Operations Memo obsoletes Field Operations Memo 2004-27.
Operations
Memo 2004-27

Recipient Mailing Attachment A will be sent to all nonexempt recipients the week of
September 27, 2004, explaining the changes to the Work Program
requirement. For an explanation of which nonexempt recipients need to be
seen, see instructions later in this memo.

Meeting the   1) A recipient whose youngest child in the AU (or who would be in the AU
Work Program   but is ineligible for reasons including: the child receives SSI, foster care
Requirement   maintenance payments or adoption assistance (see 106 CMR
                        204.305(E)(1),(2) or (3)) is:

    (a) between the ages of two and mandatory full-time school age will be
required to meet the Work Program requirement for **20 hours per
week;**

    (b) between the ages of mandatory full-time school age through eight
years old will be required to meet the Work Program requirement for
24 hours per week;

    (c) age nine or older will be required to meet the Work Program
requirement for **30 hours per week**.

    **Recipients do not start meeting the new hourly requirement until
after they meet with the AU Manager and have the Work Program
requirement and good cause reasons explained to them.**

Family Cap Child   ***In an AU where the only child is a Family Cap child***, the hourly
AUs   requirement is based on the age of the Family Cap child. For example: If
                     the only child is a Family Cap child, age 3, the hourly requirement is 20
                     hours per week. If the only child is a Family Cap child, age 7, the hourly
                     requirement is 24 hours per week. If the only child is a Family Cap child,
                     age 10, the hourly requirement is 30 hours per week.

Meeting the
Work Program
Requirement
(continued)
Family Cap Child
AUs (continued)

In an AU where the youngest child is a Family Cap child, the hourly requirement is based on the age of an older child. For example: A family consists of the recipient and two children, a Family Cap child, age 3 and a child, age 12, in the AU. The hourly requirement is based on the 12 year old and is 30 hours per week.

Two-Parent AUs

In a two-parent AU, each parent must meet the hourly requirement based on the age of the youngest child as described above.

2) A recipient (including both parents in a two-parent AU) who is residing in an EA emergency shelter and who is complying with his or her housing search activities meets the Work Program requirement.

3) Regardless of the age of the youngest child described on the previous page, a recipient (including both parents in a two-parent AU) may meet the Work Program requirement by participating **for up to 12 months total** in an education or training activity (other than a four year college). **Note: The Department implemented this change effective July 19, 2004.**

Until all reviews are complete, BEACON <u>will not</u> sanction recipients for not meeting the new hourly requirement. <u>However,</u> BEACON <u>will continue</u> to sanction recipients whose participation rate falls below 20 hours weekly.

Changes to
BEACON: New
TAO Office
Explorer Views

Effective with Increment 2.1.11, a new View has been added to the TAO Office Explorer "Assessed Person Potential Changes" grouping: "Youngest Child Turns 6 or 9." These AUs will appear on this view one month before the youngest child turns the appropriate age (either 6 or 9).

Changes to BEACON: The Work Requirements Window

Effective with Increment 2.1.11, the following reasons will be available from the **AU Exemption tab of the Work Requirements window** for Nonexempt AUs:

REASONS USED FOR SINGLE GRANTEE **AND** TWO-PARENT AU:

- Child Age 2 & Older (combined "Child between 2 and school in AU" and "Youngest Child in AU school age" reasons);

- Only FamCap Child > 3 Months;

- FEP, Child 2 & Older (combined "FEP, Child between 2 and school" and "FEP, Youngest Child school age" reasons); and

- FEP, Only FamCap Child > 3 Months.

REASONS USED **ONLY** FOR TWO-PARENT AU:

- 2 Parent, Child < 2; and

- FEP, 2 Prt Child < 2.

Changes to BEACON: The Work Requirements Window (continued)

The following reasons will be available from the **TAFDC tab of the Work Requirements window** for Nonexempt APs:

SINGLE GRANTEE REASONS:

- Youngest Child 2 to School;

- Youngest Child School thru 8;

- Youngest Child 9 or Older;

- Only FamCap > 3Mos < School;

- Noncitizen, 2 to School;

- Noncitizen, School thru 8; and

- Noncitizen, 9 or Older.

TWO-PARENT GRANTEE REASONS:

- 2 Prt, Yngst Child 2 to School;

- 2 Prt, Yngst Child School thru 8;

- 2 Prt, Yngst Child 9 or Older;

- 2 Prt, Yngst Child < 2;

- 2 Prt, Only FamCap>3Mos<School;

- 2 Prt Noncitizen, 2 to School;

- 2 Prt Noncitizen, School thru 8;

- 2 Prt Noncitizen, 9 or Older; and

- 2 Prt Noncitizen, Child < 2.

The "Noncitizen" reasons are used for the ineligible noncitizens who are Work Program required.

The Exempt Reasons on the AU Exemption and TAFDC tabs did not change.

One new "Meets Compliance" reason has been added to the Meets Compliance drop-down box:

- Meeting WPR w/ Housing Search (not to exceed six months).

The *User's Guide* will be updated with this new functionality.

AU Manager Responsibilities: Explaining Work Program Changes to Ongoing Recipients

A report of the recipients affected by these changes who need appointments scheduled will be made available and electronically sent to TAOs during the week of **September 27, 2004**. This report is sorted by TAO, AU Manager, Age Range, 2 Parent AU (2P) (Y or N), Family Cap Only Child (FO) (Y or N), Youngest Child Age, Family Cap Age, AU SSN, Grantee name, AP SSN, AP Member name, AP Role Code, AP Status and AP Exemption Reason. AU Managers must:

- prioritize scheduling appointments for recipients by the age of the youngest child as described on pages 2 and 3 of this memo:
    1. *Recipients whose youngest child is 9 years old or older.* All recipients must be seen and have the Work Program requirement (including meeting the Work Program through education or training activities) and good cause reasons explained to them *no later than **November 15, 2004***.
    2. *Recipients whose youngest child is 6 through 8 years old.* All recipients must be seen and have the Work Program requirement (including meeting the Work Program through education or training activities) and good cause reasons explained to them *no later than **December 15, 2004***.
    3. *Recipients in a two-parent AU, whose youngest child is 2 through 5 years old* must be seen and have the Work Program requirement (specifically, that both parents may meet the Work Program through education or training for 12 months) and good cause reasons explained to them *no later than **December 15, 2004***.
    4. *Recipients whose **only** child is a Family Cap child 3 months old through 1 year old* must be seen and have the Work Program requirement (including meeting the Work Program through education or training for 12 months) and good cause reasons explained to them *no later than **December 15, 2004***.

    IMPORTANT: All AUs containing a Family Cap child greater than three months old will be marked "Y" in the FO (Family Cap Only) column of the report. All two-parent AUs will be marked "Y" in the 2P column of the report.

    Note: Emergency Assistance AUs (appearing on this report) must be told at their next monthly meeting that as long as they are residing in an EA Emergency Shelter and doing housing search activities, the Work Program requirement is met. They must also have the good cause reasons explained to them. For instructions on processing these AUs, please see the section later in this memo.

- schedule appointments for these recipients as soon as possible to explain the Work Program requirement and good cause reasons. AU Managers must **begin** interviewing these recipients *on or after **October 4, 2004***.

AU Manager Responsibilities: Explaining Work Program Changes to Ongoing Recipients (continued)

Note: A full reevaluation should *only* be done at the TAO Director's discretion. For all AUs whether a full reevaluation is being completed or not, AU Managers must ensure that certain data impacting error rate is accurate (i.e., household size, shelter expenses, AU Exemption status, etc.).

IMPORTANT: Once the Work Program requirement and good cause reasons are explained to the recipient, he or she must be given a *TAFDC Work Program Requirement brochure* (WPIB 9/2004) with his or her hourly requirement circled. Enter "N/A" in the 60-day Work Search Period Begin and End Date fields. This must be noted on the Narrative tab.

Once the Work Program requirement **and good cause reasons** (see 106 CMR 701.380 (A)) are explained to the recipient, AU Managers must:

- on the AU Exemption tab of the Work Requirements window, ensure the reason on the Nonexempt drop down box is the appropriate reason (found on page 4 of this memo);

- on the TAFDC tab of the Work Requirements window, ensure the nonexempt reason on the Required Status Reason drop down box is the appropriate reason (found on page 5 of this memo);
  Note: During the Increment change the Required Status Reason was updated for some recipients, but not for others. This field must be checked to ensure accuracy.

- on the TAFDC tab of the Work requirements window, update the "Start" field with the date the work program and good cause was explained to the recipient (whether or not the Required Status Reason was changed) for tracking purposes; and

- go to the Interview Wrap-up window to authorize the change.

See the following section for examples on updating the Work Requirements window.

AU Manager Responsibilities: Ongoing Recipients Examples

Example 1: Maria Cooper has a twelve year old son. Maria has been meeting the Work Program requirement by working 20 hours per week. After meeting with the recipient, Maria's AU Manager goes to the AU Exemption tab of the Work Requirements window to ensure that the Exempt/Nonexempt reason is "Child Age 2 & Older" and goes to the TAFDC tab of the Work Requirements window and on the Required Status Reason drop down box, to ensure the reason is changed from "Youngest Child Six or Older" to "Youngest Child 9 or Older." Maria's Work Program requirement will be 30 hours per week.

Example 2: Leslie Johnson has a seven year old daughter and a one year old child subject to the Family Cap rule. Leslie has been meeting the Work Program requirement by doing 20 hours of community service. After meeting with the recipient, Leslie's AU Manager goes to the AU Exemption tab of the Work Requirements window to ensure that the Exempt/Nonexempt reason is "Child Age 2 & Older" and goes to the TAFDC tab of the Work Requirement window and on the Required Status Reason drop down box, to ensure the reason is changed from "Youngest Child Six or Older" to "Youngest Child School thru 8." Leslie's Work Program requirement will now be 24 hours per week.

In the previous examples, the recipient must be told that he or she may meet the new hourly requirement by increasing the hours of the current activity or by enrolling in another activity for the appropriate number of hours that meet the Work Program requirement.

See Attachment B for a chart with examples of two-parent AU scenarios showing the AU Exempt/Nonexempt reason, the AP Nonexempt Reason and the required hours.

AU Manager Responsibilities: Changing the "Workaround" Recipients	Field Operations Memo 2004-27 told TAO Staff about a workaround to enroll recipients in an education or training activity until the new Work Program functionality is in place. All those recipients who were enrolled according to the workaround must now be entered on BEACON by following the instructions below.

These recipients will be listed on the report sent to TAOs during the week of September 27, 2004 as well as the "WP Compliance End Date" report found in the "Field Ops Staff TAO Reports" folder of Actuate. For each recipient listed on the report with the Meets Compliance reason of "New Ed/Training Requirement" the AU Manager must go to the TAFDC tab of the Work Requirements window and change the Meets Compliance reason from "New Ed/Training Requirement" to "Participation."

AU Manager Responsibilities: Meeting the Work Program Through Education or Training	As approved by the Department, non-degree educational programs at a two-year college will count towards the Work Program requirement if the curriculum is designed to prepare a recipient for a specific type of occupation or vocational proficiency upon completion of the program. This includes the ESP programs which provide Skills Training activities outside of an Associate Degree program. These activities only meet the Work Program requirement for 12 months.

Recipients *may* enroll in a two-year Associate Degree program designed to prepare the recipient for a specific occupation upon completion of the program, but the Work Program requirement will only be met for 12 months of the two-year period. Degree programs designed to prepare students for further education will not be approved by the Department.

If the recipient is wait-listed for an education or training activity for more than *four* weeks, he or she must meet the Work Program requirement by participating in work and/or community service for the required hours per week until the slot becomes available.

If the education or training activity is less than the required hours per week, he or she must work or participate in community service for the number of hours, which combined with the education or training activity will total the required hours per week.

The instructions stated above must be followed for all recipients enrolling in an education or training activity.

AU Manager Responsibilities: Meeting the Work Program through Housing Search	When a recipient who is residing in an EA Emergency Shelter is participating in housing search, the AU Manager must do the following at the AU's next monthly meeting:

- on the TAFDC tab of the Work Requirements window select the "Meeting WPR w/ Housing Search" reason on the Meets Compliance drop down list and the End Date field not to exceed six months; and

- click on "Update." The recipient will continue to meet the Work Program requirement while successfully doing housing search.

If at any time the recipient **does not** meet the housing search requirements, the AU Manager must change the "Meeting WPR w/ Housing Search" Meets Compliance reason to "Participation," generate a Community Service referral and inform the recipient that he or she must now do community service for the appropriate amount of hours.

AU Manager Responsibilities: Extensions and Education or Training Activity	Nonexempt recipients who are in a current Department-approved education or training activity and meeting the Work Program requirement who request extensions in the final three months of their 24 months of time-limited benefits may be automatically granted a three-month extension by the TAO Director to complete the activity. A second three-month extension may be granted to complete the activity, if necessary.

Note: An education or training activity must <u>not</u> be approved for recipients if the activity was or will be started during the extension period.

AU Manager Responsibilities: Explaining the Work Program to <u>New</u> Applicants	For new applicants effective September 27, 2004, the AU Manager must:

- explain that the applicant is Work Program required for the specific hours found on page 3 of this memo (see 106 CMR 203.400(A)(5));
  Note: In a two-parent AU, *each* nonexempt parent must be present at the interview so the Work Program requirement can be explained to each parent.

- explain the exemptions from Time-Limited Benefits and the Reduced Need and Payment Standard (see 106 CMR 203.100);

AU Manager Responsibilities: Explaining the Work Program to New Applicants (continued)

- explain how the applicant meets the Work Program requirement including making him or her aware of education or training activities, FEP and Supported Work (see 106 CMR 203.400(A)(2));

- **explain the good cause reasons to the applicant (see 106 CMR 701.380 (A)). Enter on the Narratives tab that this has been explained to the applicant**;

- inform the applicant that he or she has 60 days from the interview to meet the hourly requirement;
  Note: An applicant who has used the initial 60-day work search period must meet the Work Program requirement within 10 days unless good cause exists or a "Meets Compliance" reason (other than "Participation") exists.

- once the Work Program requirement is explained to the recipient, he or she must be given a *TAFDC Work Program Requirement brochure* (WPIB 9/2004) with his or her hourly requirement circled. Enter the 60-day Work Search Period Begin and End Date fields. Note these actions on the Narrative tab;

- inform the applicant that after the 60-day work search period has passed and he or she is not meeting the Work Program requirement without good cause, the sanction process will begin;

- discuss child care availability with the applicant;

- on the Work Requirements window, ensure the AU Exemption tab has the Exemption Status of "Nonexempt" unless an exemption reason applies;

- on the TAFDC tab of the Work Requirements window, click "Yes" on the Work Program Required radio button;

- in the Required Status Reason drop down box, select the appropriate reason; and

- make any referrals necessary for the applicant to meet the hourly requirement.

Questions   If you have any questions, please have your Hotline designee call the Policy Hotline at 617-348-8478.

{BEACON USER STREET_ADDRESS}   Important Notice - Read Carefully
{BEACON USER CITY, STATE, ZIP}   Este Mensaje Es Importante - Lea Cuidadosamente

Massachusetts Department of Transitional Assistance

{RECIPIENT NAME}   {RECIPIENT SSN}
{RECIPIENT ADDRESS}   {BEACON USER OFFICE NAME}
{RECIPIENT CITY/TOWN, STATE, ZIP}

September 2004

Important Notice Please Read

Dear {Recipient}:

The Department has changed its rules about participating in the TAFDC Work Program:

1). The number of required hours per week has been increased for families in which the youngest child is six or over:

   (a) If your youngest child is between **six and eight years old**, you are now required to participate in the Work Program for **24 hours per week**.

   (b) If your youngest child is age **nine or older**, you are now required to participate in the Work Program for **30 hours per week**.

   Important: If your youngest child is between **two and six** you must continue to participate in the Work Program for **20 hours per week**.
   If you have a child not included in your TAFDC benefits because of the "Family Cap" rule, talk to your worker about how many hours you have to participate to meet the Work Program.

2). You may meet the Work Program requirement by participating for up to 12 months total in an **education or training activity** (other than a four-year college) regardless of the age of your youngest child.

3). If you are homeless and living in a shelter, you may meet the Work Program rules by complying with your EA housing search requirements.

4). More "Good Cause" reasons have been added. If you feel you have good cause for not meeting the Work Program requirement or your Employment Development Plan (EDP), contact your worker. Good Cause includes:

- lack of appropriate and available child care;

- lack of affordable and reliable transportation;

- lack of an available and appropriate community service site identified by the Department;

- a disability or illness;

- participating in housing search; or

- other reasons established by the Department (including a family crisis, emergency or other compelling circumstances or that the job violates state or federal laws or is available due to a strike or a lockout).

You can meet the Work Program by:

- Working in a job for pay;
- Participating for up to 12 months total in a Department-approved education or training activity (other than a four-year college);
- Participating in a community service program;
- Working full time in the Full-Employment Program; or
- A combination of the activities listed above.

Your worker will schedule an appointment with you to discuss the new Work Program requirement. Until that appointment you must continue to meet the 20-hour Work Program requirement you now have. If you want to change the activity you are doing to meet the Work Program requirement before that appointment, contact your worker.

If you need child care, we will help you to receive it. If child care is not available, you will not have to meet this requirement. Ask your worker about child care availability.

If you have any questions about the new Work Program requirements, you should call _____ and ask for _____.

Two-Parent AU Examples				
Exempt/Nonexempt Parents (P1, P2)	Age of Youngest Child	AU Reason	AP Nonexempt Reason	Required Hours
P1: Nonexempt P2: Exempt	One	2 Parent, Child < 2	2 Prt, Yngst Child < 2	20
P1: Nonexempt P2: Exempt	Two	Child Age 2 & Older	2 Prt, Yngst Child 2 to School	20
P1: Nonexempt P2: Exempt	Seven	Child Age 2 & Older	2 Prt, Yngst Child School thru 8	24
P1: Nonexempt P2: Exempt	Nine	Child Age 2 & Older	2 Prt, Yngst Child 9 or older	30
P1: Nonexempt P2: Exempt	Family Cap child age one not in AU and other child in AU age two	Child Age 2 & Older	2 Prt, Yngst Child 2 to School	20
P1: Nonexempt P2: Exempt	Family Cap child age one not in AU and other child in AU age four	Child Age 2 & Older	2 Prt, Yngst Child 2 to School	20
P1: Nonexempt P2: Exempt	Family Cap child age five not in AU and other child in AU age eight	Child Age 2 & Older	2 Prt, Yngst Child School thru 8	24
P1: Nonexempt P2: Exempt	Family Cap child age six not in AU and other child in AU age eleven	Child Age 2 & Older	2 Prt, Yngst Child 9 or Older	30
P1: Nonexempt P2: Exempt (Disabled)	Only Child Family Cap: Age One	Only FamCap Child > 3 Months	2 Prt, Only FamCap>3 mos< School	20
P1: Nonexempt P2: Exempt	Only Child Family Cap: Age Two	Only FamCap Child > 3 Months	2 Prt, Yngst Child 2 to School	20
P1: Nonexempt P2: Exempt	Only Child Family Cap: Age Seven	Only FamCap Child > 3 Months	2 Prt, Yngst Child School thru 8	24
P1: Nonexempt P2: Exempt	Only Child Family Cap: Age Nine	Only FamCap Child > 3 Months	2 Prt, Yngst Child 9 or Older	30

Two-Parent AU Examples (continued)				
Exempt/Nonexempt Parents (P1, P2)	Age of Youngest Child	**AU** Reason	**AP** Nonexempt Reason	Required Hours
P1: Nonexempt P2: Nonexempt	Two	Child Age 2 & Older	2 Prt, Yngst Child 2 to School	Both parents must do 20
P1: Nonexempt P2: Nonexempt	Seven	Child Age 2 & Older	2 Prt, Yngst Child School thru 8	Both parents must do 24
P1: Nonexempt P2: Nonexempt	Nine	Child Age 2 & Older	2 Prt, Yngst Child 9 or older	Both parents must do 30
P1: Nonexempt P2: Nonexempt	Family Cap child age one not in AU and other child in AU age ten	Child Age 2 & Older	2 Prt, Yngst Child 9 or Older	Both parents must do 30
P1: Nonexempt P2: Nonexempt	Family Cap child age two not in AU and other child in AU age five	Child Age 2 & Older	2 Prt, Yngst Child 2 to School	Both parents must do 20
P1: Nonexempt P2: Nonexempt	Family Cap child age five not in AU and other child in AU age seven	Child Age 2 & Older	2 Prt, Yngst Child School thru 8	Both parents must do 24
P1: Nonexempt P2: Nonexempt	Family Cap child age nine not in AU and other child in AU age eleven	Child Age 2 & Older	2 Prt, Yngst Child 9 or Older	Both parents must do 30
P1: Nonexempt P2: Nonexempt	Only Child Family Cap: Age One	Only FamCap Child > 3 Months	2 Prt, Only FamCap>3 mos <school	Both parents must do 20
P1: Nonexempt P2: Nonexempt	Only Child Family Cap: Age Two	Only FamCap Child > 3 Months	2 Prt, Yngst Child 2 to School	Both parents must do 20
P1: Nonexempt P2: Nonexempt	Only Child Family Cap: Age Seven	Only FamCap Child > 3 Months	2 Prt, Yngst Child School thru 8	Both parents must do 24
P1: Nonexempt P2: Nonexempt	Only Child Family Cap: Age Nine	Only FamCap Child > 3 Months	2 Prt, Yngst Child 9 or Older	Both parents must do 30