



Commonwealth of Massachusetts
 Executive Office of Health and Human Services
Department of Transitional Assistance
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Field Operations Memo 2005-23
April 18, 2005

To:  **Transitional Assistance Office Staff**

From: **Cescia Derderian, Assistant Commissioner for Field Operations**

Re: **TAFDC – 12 Month Limit on Education or Training Activity Meeting the Work Program Requirement**

Overview

Participating in an education or training activity meets the Work Program requirement for up to 12 months (see 106 CMR 203.400(A)(2)(i)). The 12 months may be a **calendar year** or may be a series of **non-consecutive months**.

Because the months can be **non-consecutive**, a counter on the Monitor Participation window and the TAFDC tab of the Work Requirements window on BEACON tracks when the 12 months have been used. At the end of the 12 months, education or training will no longer meet the Work Program requirement, though a recipient *may* continue to participate in the education or training activity.

A notice informing recipients that they are reaching the end of the 12 months will be mailed when month 9 participation forms have been entered on the Monitor Participation window. This means the notice will be mailed to the recipient **the month after** month 9 has been used.

Purpose of Memo

This Field Operations Memo informs TAO staff about:

- the notice to recipients who have participated in an education or training activity for 9 months; and
- processing recipients and applicants affected by this 12-month limit.

Notice

Attachment A will be sent to those Work Program required recipients whose Education and Training Counter on the Monitor Participation window reads “9” (that is they have used 9 of the 12 months). This will be sent in an overnight batch job process on the 25th of each month. The notice informs recipients that:

- they are reaching the end of the time period that an education or training activity meets the Work Program requirement;
 - other activities may meet the Work Program requirement;
 - their AU Manager will contact them to discuss how to meet the Work Program requirement; and
 - they may **still** participate in their current education or training activity in addition to the new activity they choose to meet the Work Program requirement, however those hours will not count toward their participation requirement.
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BEACON Modifications

Increment 2.1.14 of BEACON contains the following changes in functionality to help AU Managers track and process recipients affected by the 12 month limit on education or training to meet the Work Program. AU Managers are reminded that whether the recipient is still active in the component or not (because the 12 month period may be non-consecutive), the notice will be mailed out to the recipient **the month after** month 9 has been used.

Revised Views

- The View “ESP AUs Requiring an Appointment” has been revised:
 - ♦ Nonexempt recipient names will appear on this View once their Education and Training Counter on the Monitor Participation window reads “9.”
Note: Recipient names will appear on this View once the Education and Training Counter reads “9” so AU Managers have advance notice of recipients who are reaching the end of the 12 months.
 - ♦ Recipient names will no longer appear on this View when:
 - recipients are not active in an education or training activity;
 - recipients become exempt from the Work Program;
 - the Education and Training Counter did not accrete to “9” (i.e., the hours were not used to meet the Work Program requirement);
 - the assessment interview was scheduled on BEACON; or
 - the recipient closed.
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**BEACON
Modifications
(continued)**
Revised Views

- ♦ The “ESP AUs Requiring an Appointment” View will be sorted by:
 - ESP Grantee Name,
 - SSN,
 - Nonexempt (Y or N),
 - Program,
 - Status,
 - Ed/Training Counter, and
 - Counter Notice Date (anyone who did **not** receive a notice will have an Ed/Training Counter greater than or equal to “9.” The date displayed in the date field for these AUs has no relevance in this process, and should be ignored.)
 - The View “Active Component Activities” will have an “Ed/Training Counter” field added to display the number of months used in the 12-month period.
 - The Monitor Participation window will display the following pop-up message: “This person may soon reach the 12-month ed/training limit. If a WP Education and Training Notice has been sent, please schedule an appointment for ESP.” The message will begin to display when the AU Manager enters the information from the Participation and Attendance form from month 9 onto the Monitor Participation window, the Education and Training Counter accretes to “9” and the AU Manager clicks on “Next” or “Finish.” This message will continue to display each month thereafter when the AU Manager enters the information from the Participation and Attendance form for the previous month, unless the recipient:
 - ♦ has reached the 12-month limit (once the recipient has reached 12 months of participation, the message will no longer be displayed); or
 - ♦ is no longer enrolled in the education or training activity; or
 - ♦ becomes exempt from the Work Program; or
 - ♦ does not meet the appropriate participation level (in which case, the counter will not accrete).
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Monitor
Participation
Window

**BEACON
Modifications
(continued)**
TAFDC Tab of the
Work
Requirements
Window

- The TAFDC Tab of the Work Requirements window will also display the Education and Training Counter. The Counter is person specific and will display months accreted for each grantee in a two-parent AU. Click on “Client List” in the Tool Bar to select the grantee. The Counter has been placed on the TAFDC Tab of the Work Requirements window, so the information about the months used for an education or training activity is accessible for the AU Manager when taking an application or changing the Work Program required status from “Exempt” to “Nonexempt” prior to the AU Manager making a referral from the ESP Services workflow.

Reminder: Even though an applicant may have used twelve months of an education and training activity, he or she may still enroll in an education or training activity. The applicant must be informed that the activity will not meet the Work Program requirement and must enroll in another activity to meet the Work Program requirement.

**AU Manager
Responsibilities:
Recipients**

If the recipient’s name appears on the “ESP AUs Requiring an Appointment” View after the 25th of the month **and** a counter notice has been sent out, the AU Manager **must** schedule an appointment **in month 11** to discuss the other activities that meet the Work Program requirement following month 12. The recipient **must** be participating in the new activity the month following month 12. If the recipient fails to keep the appointment, he or she must close for failure to keep an appointment.

The purpose of the meeting is to follow-up with the recipient to:

- determine progress being made in completing the education or training activity as well as to determine when the education or training activity will end;
- ensure the recipient continues to meet the Work Program requirement; and
- assist the recipient with choosing the new activity, as needed.

The AU Manager should assist the recipient to determine what activity will help the recipient meet the Work Program requirement once the education and training activity has ended.

**AU Manager
Responsibilities:
Recipients
(continued)**

At the scheduled interview, the AU Manager must remind the recipient of the following:

- how many months of the 12 month period he or she has used in an education or training activity to meet the Work Program;
- that participating in an education or training activity only meets the Work Program requirement for 12 months;
- if he or she continues to participate in the current education or training activity for the remaining months in the 12-month period, he or she must meet the Work Program requirement through another activity (Work, Supported Work, Full Employment Program or community service) for the required number of hours (20, 24 or 30) the month following month 12;

Reminder: Before making a referral to community service, the AU Manager must always call the community service site to check availability.

- **the good cause reasons for not meeting the Work Program (see 106 CMR 701.380 (A)). Enter a note on the BEACON Narratives tab that good cause reasons have been discussed;** and
- child care availability including updating the child care referral, as needed.

**AU Manager
Responsibilities:
Applicants Who
Have Used the
12 Months**

The TAFDC Tab of the Work Requirements window will have the Education and Training Counter displayed so the AU Manager can determine how many of the 12 months an applicant had participated in an education or training activity prior to closing. During the application interview, the AU Manager must tell an applicant who has already participated for 12 months in an education and training activity to meet the Work Program requirement that:

- he or she **must** meet the Work Program requirement through an activity **other than** education or training (Work, Supported Work, Full Employment Program or community service) for the required number of hours (20, 24 or 30); and
 - the recipient may enroll in an education or training activity but, it does not meet the Work Program requirement.
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**AU Manager
Responsibilities:
Recipients
Whose Counter
Is “9” or Greater
At Time of
Increment 2.1.14**

AU Managers must check their View: “ESP AUs Requiring an Appointment.” Recipients listed on the View with a “9” or greater in the “Ed/Training Counter” column must have an appointment scheduled. Because the functionality for mailing these notices was not available until Increment 2.1.14, these recipients have not received the notice (Attachment A) informing them that they are reaching the end of the time period that an education or training activity meets the Work Program requirement.

REMEMBER: Recipients listed on the View will receive the notice (Attachment A) when the counter reads “9.”

To ensure that recipients who are reaching the end of the twelve months have an appointment scheduled first, AU Managers must schedule the recipients who have used the greatest number of months first. The View can be sorted by greatest number of months used by double clicking on the “Ed/Training Counter” column header. Additionally, a report will be e-mailed from Central Office listing the recipients who have not received the notice.

IMPORTANT: Until the recipient whose “Ed/Training Counter” is 12 or greater has been interviewed and been referred to a new activity that meets the Work Program, he or she must **not** be sanctioned for failure to meet the Work Program Requirement. AU Managers must **not authorize** these Level 3 or Level 4 sanctions created by BEACON.

At the scheduled interview, the AU Manager must tell recipients whose Ed/Training Counter is “12” that they have **30 days** from the interview to meet the Work Program requirement through an activity **other than** education or training (Work, Supported Work, Full Employment Program or community service) for the required number of hours (20, 24 or 30). AU Managers must tell recipients whose Ed/Training Counter is “9” through “11” that they must meet the Work Program requirement through an activity **other than** education or training by the month following month 12. AU Managers must follow the procedures found in the “AU Manager Responsibilities: Recipients” section of this memo to enroll the recipient in a new activity. This information **must** be entered on the BEACON Narratives Tab.

**AU Manager
Responsibilities:
Applicants
Whose Counter
Is Greater than
“9”**

The TAFDC Tab of the Work Requirements window will also display the Education and Training Counter. The Counter has been placed on the TAFDC Tab of the Work Requirements window, so the information about the months used for an education or training activity is accessible for the AU Manager when taking an application.

At the application interview, the AU Manager must tell applicants whose Ed/Training Counter is greater than “9” and less than “12”:

- that education or training activities only meet the Work Program requirement through the end of their 12th month;
- how many months are remaining of the 12 months;
- that they may enroll and participate in an education or training for the remaining months of the 12 months; and
- that once the 12 months are completed, they must enroll and participate in another activity to meet the Work Program requirement.

**Sanctions The
Month After 12
Months Of
Education or
Training Activity**

The recipient **must** be participating in a new activity that meets the Work Program requirement the month following month 12 to avoid being sanctioned.

A sanction will be created in the following two situations for the work program required recipient who is at month 12 of the Education and Training counter and he or she:

- **is not** participating in another activity to meet the Work Program; or
- **is** participating in another activity, but not meeting the required hours of the Work Program.

In both of these situations, AU Managers are reminded that prior to authorizing a Level 3 or Level 4 sanction for this month, good cause **must** be explored. The AU Manager must contact the recipient to:

- explain good cause;
 - tell the recipient how to verify the good cause reason;
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**Sanctions The
Month After 12
Months Of
Education or
Training Activity**

- generate a VC-1 giving the recipient 10 days to prove good cause;
- once good cause is verified, the AU Manager must delete the pending sanction request from the Interview Wrap-up window by:
 - ♦ highlighting and selecting the existing pending sanction request;
 - ♦ clicking on the Delete push button;
 - ♦ clicking on the “Yes” button in response to the question “Are you sure you want to delete this data?”;
 - ♦ on the Sanctions tab of the AU Composition Results window using the removal reason of “Good Cause.” This will prevent the sanction level from increasing the next time the recipient is sanctioned; and
 - ♦ removing the recipient’s Ineligibility Reason that appears on the AU Composition Results window; or
- if good cause is **not** verified within the 10 days or the recipient does not claim good cause, the sanction must be authorized following instructions in Field Operations Memo 2005-8.

REMEMBER: Good Cause language appears on the Participation and Attendance forms.

**Exception to the
12 Month Limit
on Education
and Training**

If the recipient’s education and training activity is ending **within three consecutive calendar months from month 12**, the recipient provides verification of the education or training activity’s end date **and** the recipient has been fully cooperating with the requirements of the activity, he or she may be allowed to meet the Work Program with that education and training activity for those three calendar months provided they continue to cooperate with the activity’s requirements. If the AU Manager is unsure of whether the recipient should receive this exception, he or she **must** speak to his or her supervisor before approving or denying the education or training activity. This information **must** be entered on the BEACON Narratives Tab.

**Entering
Participation and
Attendance Form
Information After
12 Months Limit**

Recipients' Participation and Attendance forms for the education and training activity received after month 12, must be entered on the Monitor Participation window in the following ways:

- If the recipient is participating in the education and training activity in addition to the new activity that meets the Work Program, the AU Manager must:
 - enter the actual hours from the form for the new activity first;
 - enter the hours of the education and training activity next. The education and training hours will **not** be counted toward the Work Program participation requirement; and
 - keep the Participation and Attendance forms for all activities in the AU record.
 - If the recipient does not return the participation form for the new activity but does return the participation form for the education or training activity, enter the Participation and Attendance form for the education or training activity. BEACON will **not** count the hours of this activity once the Ed/Training Counter is greater than "12" but if the recipient is getting support services in connection with this activity, entering the hours will allow the support services to be paid.
 - If the recipient is completing the education and training activity within three calendar months from month 12, the AU Manager must:
 - enter the actual hours from the form for each month of the three months the recipient returns the form;
 - give the recipient good cause by going to the Sanction Tab of the AU Composition window and select "Ed/Training: 3 Month Ext"; and
 - select the appropriate verification of good cause, either the "ESP-16" or the "Statement from Provider."
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Entering Participation and Attendance Forms for Combination AUs with Changing Hours

AU Managers must enter the Participation and Attendance form from each activity in the same BEACON session (i.e., at the same time).

If only one of the Participation and Attendance forms is received by the “AU Manager Due Date” (usually the 18th of the month), the AU Manager must enter the hours reported from that form on the Monitor Participation window, even if the hours do not meet the Work Program required hours. A sanction will be created.

Once the recipient returns the other Participation and Attendance form(s) after the “AU Manager Due Date,” the AU Manager must enter the hours reported from that form(s) on the Monitor Participation window. If the hours from that form in combination with the hours on the previously entered form for that month total the appropriate number of hours for the Work Program requirement, the sanction must be deleted.

AU Managers and Supervisors must carefully review each of these “Combination AUs” monthly to ensure that inappropriate sanctions are not authorized. BEACON will calculate the reported hours.

Entering Participation and Attendance Forms and Monthly Reports

Special attention must be paid to recipients who have a combination of employment hours and hours from an activity listed on the Participation and Attendance form. AU Managers and Supervisors must carefully review each of these “Combination AUs” monthly to ensure that inappropriate sanctions are not authorized. BEACON will total the reported hours of the activity and employment. As long as the total hours meet the Work Program requirement, no sanction will be created.

Questions

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

Attachment A

{BEACON USER STREET_ADDRESS}
{BEACON USER CITY, STATE, ZIP}

Important Notice - Read Carefully
Este Mensaje Es Importante - Lea Cuidadosamente

Massachusetts Department of Transitional Assistance

{RECIPIENT NAME}
{RECIPIENT ADDRESS}
{RECIPIENT CITY/TOWN, STATE, ZIP}

{RECIPIENT SSN}
{BEACON USER OFFICE NAME}

Important Notice Please Read

Dear -----:

Our records show that you have used at least 9 months of an education or training activity to meet the Work Program requirement. **You may meet the Work Program requirement with an education or training activity for 12 months.**

After being in the education or training activity for 12 months, you can meet the Work Program by:

- working in a job;
- working full-time in the Full Employment Program;
- participating in supported work; and/or
- participating in community service.

Your worker will schedule an appointment to discuss this with you.

If you do not enroll and participate in a new activity after month 12 or provide verification of good cause, the Transitional Assistance benefits you receive for yourself or your family may be stopped. You will receive a separate notice if your benefits will be stopped.