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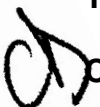
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Field Operations Memo 2006-31 A
August 21, 2006

To: **Transitional Assistance Office Staff**

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

Re: **TAFDC: Work Program Participation Review - Phase 3: *Age School through Eight,* Authorizing Batch Sanctions and Removing Interrupted Sanctions – Phase 3 and TAFDC Recipients Receiving SSI**

Purpose of Memo

The Department is in the process of making changes to the TAFDC program to comply with federal reauthorization of the TANF block grant. One of the most significant areas to be addressed is participation in work-related activities. A recent review of TAFDC AUs has found recipients who are Work Program required but who are not participating in an activity for the required number of hours.

<u>**REMINDER:**</u> AU Managers should use their "Child Turning 6 and 9" View to monitor the changes in the AP's work program requirement.

This Field Operations Memo is being reissued with corrected procedures on Pages 9 and 10. This Field Operations Memo obsoletes Field Operations Memo 2006-31.

Field Operations Memo 2006-19 addressed increasing participation for Work Program Required AUs whose youngest child was age two through school and AUs who were coded "Exempt" but appeared to be "Nonexempt."

Field Operations Memo 2006-27 in part addressed increasing participation for Work Program Required AUs whose youngest child was age nine and older and AUs who were coded "Youngest Child 2 to School" or "Youngest

Purpose of Memo (continued)

Child School thru 8." This is the third in a series of Field Operations Memos focusing on increasing Work Program participation for TAFDC recipients.

This Field Operations Memo informs TAO staff of the need to conduct a desk review to determine whether the AP coded "Youngest Child 2 to School" should be changed to "Youngest Child School thru 8."
If the desk review identifies that the recipient must increase the hours of participation, the recipient **must** be contacted by the AU Manager for an interview to be referred to or enrolled in an activity to help them meet the required hours or to explain the Work Program requirement as well as other AU changes.

As stated in Commissioner's Corner of March 2006 *Transitions*, the Department needs to maximize work and training activities for families that are subject to Work Program requirements.

This Field Operations Memo also provides a follow-up to Field Operations Memo 2006-27: "Work Program Participation Review - Phase 2: *Age Nine and Older*; Authorizing Batch Sanctions and Removing Interrupted Sanctions – Phase 2." Specifically, procedures for processing AUs who are in "Interrupt Status" or Batch Sanctions that are pending authorization are included.

Additionally, this Field Operations Memo gives TAO Staff instructions for processing TAFDC recipients who are receiving SSI and either remain active or need some other correction in BEACON to reflect the receipt of SSI (i.e., Work Requirement Reason needs to be changed).

Specifications for the "Nonexempt Child School Through Eight" Participation Report

The report relating to increasing participation for AUs with a child age school through eight will be e-mailed with this Field Operations Memo. AU Managers must use the report to determine AUs needing desk reviews/face-to-face interviews.

The report entitled "Nonexempt Child School through Eight" captures APs coded as "Youngest Child 2 to school" whose AP characteristics make it *appear* as though the AP should be coded "Youngest Child School thru 8."

This report will be similar to those issued with Field Operations Memo 2006-19 and Field Operations Memo 2006-27, having drop-down lists from which the AU Manager should select the action taken on the AU. The selections are documented later in this Field Operations Memo.

AU Manager's Responsibilities: "Nonexempt Child School through Eight"

AU Managers must review each recipient on the "Nonexempt Child School through Eight" report to determine if:

- the AP Required Status reason on the TAFDC tab of the Work Requirements window is still valid;
- if the AP Required Status reason on the TAFDC tab of the Work Requirements window has already been changed, or
- if the AP Required Status reason on the TAFDC tab of the Work Requirements window is no longer valid and the AP must be coded "Youngest Child School thru 8" in the AP Required Status reason field on the TAFDC tab of the Work Requirements window.

AU Managers must perform a desk review to determine whether or not the AP Required Status reason on the TAFDC tab of the Work Requirements window is still valid or if the AP Required Status reason on the TAFDC tab of the Work Requirements window has already been changed to "Youngest Child School thru 8."

If the AP Required Status reason on the TAFDC tab of the Work Requirements window is still valid or if the AP Required Status reason on the TAFDC tab of the Work Requirements window has already been changed to "Youngest Child School thru 8," the report must be coded with the appropriate action taken. No further AU Manager action is required.

If AP Required Status reason on the TAFDC tab of the Work Requirements window is no longer valid, the AU Manager must schedule an appointment for the recipient to explain to him or her that he or she must increase his or her hours of participation to the appropriate level (24 hours per week). It must be noted on the appointment letter that the reason for the appointment is to have the recipient increase his or her participation in the work program to 24 hours per week. The appointment letter on BEACON must **NOT** be used for this appointment.

At the appointment the AU Manager must explain that the recipient must increase the hours of participation to meet the work program requirement **and good cause reasons** (see 106 CMR 701.380 (A)) for failing to meet the increased hours. If the recipient claims good cause for not meeting the work program, follow established procedures for verifying good cause.

Once the increased hours and good cause reasons are explained to the recipient, the AU Manager must:

- on the TAFDC tab of the Work Requirements window, ensure the nonexempt reason on the Required Status Reason drop down box is changed to "Youngest Child School thru 8";

AU Manager's Responsibilities: "Nonexempt Child School through Eight" (continued)

- on the TAFDC tab of the Work Requirements window, update the "Start" field with the date the Required Status Reason was changed for tracking purposes; and
- go to the Interview Wrap-up window to authorize the change.

The recipient is now Work Program required for 24 hours per week. BEACON will require the 24 hours per week participation levels be met the following month.

Although the increased Work Program hours are effective the month following the change, recipients **must not be sanctioned** for failure to meet the *increased* hours for the Participation and Response forms submitted that month. Those Participation and Response forms, *even though returned after the change to the Required Status Reason*, report on participation hours before the Required Status Reason was changed and are not subject to the increased hours' requirement.

The Participation sanction must be removed by the AU Manager going to the Results tab of the AU Composition Results window and:

- highlighting the sanctioned AP;
- clicking the "Select" button to populate the AU Member tab;
- clicking on the "Sanctions" tab;
- highlighting the sanction from the drop-down list;
- clicking the "Select" button to populate the Sanction tab;
- choosing the removal reason of "Administrative/System Error" from the drop-down list;
- clicking on "Save"; and
- clicking on "Finish."

The AU Manager must also remove the AP Level Eligibility Factor Reason Code on the AU Composition Results window to remove the sanction and go to the Interview Wrap-up window and authorize the removal of the sanction reason.

Example: Mary's AU Manager changes Mary's Required Status Reason in June. Because Mary's Participation and Attendance form returned in July shows Mary participated for 20 hours per week, a sanction is created because she did not meet the new 24 hour requirement. Mary's AU Manager removes the sanction following instructions above. If Mary does **not** meet the 24 hour Work Program requirement for July (Mary's Participation and Attendance form returned in August), without good cause, she should be sanctioned.

AU Manager's Responsibilities: "Nonexempt Child School through Eight" (continued)

- If the recipient *does not* keep the appointment *without good cause*, the AU Manager must annotate the report with "Reviewed - Change in Hourly Requirement." The AU must **not** be closed. The AU Manager must:

  ♦ ensure that "Participation" has been selected on the Compliance field of the Work Requirements window. No end date is required;

  ♦ ensure the nonexempt reason on the Required Status Reason drop down box is changed to "Youngest Child School through Eight";

  ♦ on the TAFDC tab of the Work Requirements window, update the "Start" field with the date the Required Status Reason was changed for tracking purposes; and

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

The AU Manager must inform the recipient either by phone or in writing that his or her Work Program hours have increased to 24 hours per week. This action must be noted on the BEACON Narratives tab.

If the recipient missed the appointment and had good cause for missing it, schedule another appointment following established procedures. Do not code the report until after the date of the second appointment.

If the recipient is now exempt, the AU Manager must give the recipient a *VC-1*, allowing the recipient ten days to provide proof of the exemption. Once proven, the AU Manager must change the AU Exemption on the Work Requirements window following established procedures.

Annotating the "Nonexempt Child School through Eight" Report

The "Nonexempt Child School through Eight" report is sorted by TAO and AU Manager. AU Managers must review the report to determine action needed. Once the action has been completed, AU Managers must select the appropriate response from the drop down list on the report. Supervisors must review the report for completeness. Once reviewed it must be sent to the TAO Director. TAO Directors must e-mail the annotated report to Julie Noble by September 1, 2006.

The report will have drop-down selections to be chosen for action taken on the AU:

- If the AU is closed or pending to close, the AU Manager must select: "Closed or Closing."

- If the AP is *now exempt*, the AU Manager should select: "AP Now Exempt."

- If the AU's characteristics (e.g., age of child is incorrect on BEACON) were updated as part of the desk review, the AU Manager should select: "Desk Review - Characteristics Changed."

- If the hourly requirement for the AP remains the same after a face-to-face interview, the AU Manager should select: "Reviewed – No Change In Hourly Requirement."

- If the AP's hours must be increased after a face-to-face interview (or the AP's hours must be increased and he or she did not keep the appointment), the AU Manager should select: "Reviewed - Change in Hourly Requirement."

AU Requiring a Reevaluation

If when reviewing the AU, the AU Manager determines that the AU has not been reviewed within one year, a reevaluation must be scheduled to review eligibility and ensure that he or she is meeting the Work Program. If the recipient does not keep the appointment, the AU should be closed following established procedures. This is the only reason an AU should be closed as it relates to this memo.

**Interrupt
Sanctions/
Batch Sanctions
Reports**

Two reports relating to sanctions ("Interrupt Sanction" and "Batch Sanctions Pending Authorization") will be e-mailed with this Field Operations Memo. AU Managers must use the two reports to determine follow-up action needed for the AUs listed on the reports:

- For AUs listed on the "Interrupt Sanctions" report, AU Managers must review the AUs. If appropriate, a community service referral must be issued, the interrupt sanction must be removed or the interrupt sanction must remain (due to the AP having a "Meets Compliance" reason.) following instructions found in Field Operations Memo 2006-13. Once action has been taken, the AU Manager must code the report by selecting one of the following actions:

  ✓ Closed or closing – the AU was closed or is pending to close at some point since the report was run.

  ✓ *Now Exempt* – the AU is no longer work program required.

  ✓ Issued CS Referral – a community service referral was issued and the sanction process is no longer in an "interrupt" status.

  ✓ Removed Interrupt Sanction – the interrupt sanction was removed because the AP is now participating in an activity.

  ✓ Interrupt remains: Meets Compliance – the AP has a "Meets Compliance" reason that correctly prevents the sanction process from continuing.

- For AUs listed on the "Batch Sanctions Pending Authorization" report, AU Managers must review the AUs to determine what action to take on the pending sanction authorization. If appropriate, the pending batch sanction must be either authorized or removed. A batch sanction is removed by going to the Interview Wrap-up window and highlighting and selecting the batch sanction. Click on the "Delete" button. A pop-up message will instruct the AU Manager to remove the action and Ineligibility Reason from the AU Composition Results window, then delete the sanction on the Interview Wrap-up window. Once action has been taken, the AU Manager must code the report by selecting one of the following actions:

  ✓ Closed or closing – the AU was closed or is pending to close at some point since the report was run.

**Interrupt
Sanctions/
Batch Sanctions
Reports
(continued)**

✓ Authorized Sanction – the AU Manager reviewed the AU and determined the sanction action was appropriate.

✓ Removed Sanction – the AU Manager reviewed the AU and determined the sanction action was not appropriate or occurred too far in the past and the batch sanction action was removed.

REMINDER: Once a pending sanction action has been removed from the Interview Wrap-up window, the next time an AP is sanctioned, the Level of the sanction will **not** increase. This means if an AP's Level 3 participation sanction is removed *prior to being authorized*, the next time the AP fails to meet participation requirements he or she will receive a Level 3 sanction.

Supervisors must review **both** sanction-related reports for completeness. Once reviewed they must be sent to the TAO Director. TAO Directors must e-mail the annotated reports to Julie Noble by September 1, 2006.

AU Manager's Responsibilities: TAFDC Recipient Receiving SSI Procedures

TAFDC recipients who are receiving SSI are ineligible to receive TAFDC for themselves. When reviewing the "TAFDC Recipients in Receipt of SSI" report. AU Managers must determine if the TAFDC recipient needs to be closed. For each recipient needing to be closed, the AU Manager will do the following on the AU Exemption tab of the Work Requirements window:

✓ For one-parent AUs, the AU exemption status must be changed to 'Exempt' when the parent is receiving SSI benefits.
✓ For two-parent AUs, the AU exemption status is changed after the AU Manager looks at *both* parents work program requirement. Only two-parent AUs where *both* parents' exemption status is "Exempt" may be changed to "Exempt."
✓ Change the "Reason" field to the appropriate reason.

For each SSI recipient, the AU Manager will do the following:

On the AU Composition Results window, the AU Manager must select the SSI recipient and:

• select the Reason Category of "Disability"

• select the Reason "Eligibility for SSI"; and

• click on "Finish."

For dependents over 18, the AU Manager must:

• select the Reason Category of "Program Rules";

• select the reason "Depd Age 18 or 19 yrs old and does not meet age/school requirements." and

• click on "Finish."

On the Work Requirements window, the AU Manager must change the AP work program "Required" radio button to "No" and change the AP "Work Program Required Status Reason" to:

• "Inelig Grnt/Other Prnt on SSI." for grantees or other parents;

AU Manager's Responsibilities: TAFDC Recipient Receiving SSI Procedures (continued)

- "Ineligible Grantee" for a non-legally liable grantee; and
  Note: An AP is designated as "non-legally liable" when all the active or ineligible dependents have a personal relationship other than "child" to the grantee.

- "Dependent Child Age 1-18" or "MA Eligible Child Age < 1" depending on the age of the dependent receiving SSI.
  Note: If the child is over age 18, the dependent should be closed.

The FS Work Program Requirement and the FS ET reasons will be automatically changed on BEACON to 'Physically or Mentally Unfit' since the AP is not work required for either program for all groups.
REMEMBER: **All** changes to an AU/AP **must be** authorized on Interview Wrap-up following established procedure.

On the AU Mandatory/Responsible window, BEACON will change the AP status as follows:

- the "Applying" radio button will be changed to "No";

- the "Mandatory Inclusion" radio button will be changed to "Yes" for:
  ✓ grantees (including teen parent grantees);
  ✓ dependent teen parent or other adult parent; and
  ✓ dependent child under age 18.

- the "Mandatory Inclusion" radio button will be changed to 'No' for:
  ✓ non-legally liable grantees.

On the AU Mandatory/Responsible window, BEACON will change the Responsibility Reason to:

- 'SSI Recipient' for grantees (including teen parent grantees) or other parents (both adult and teen);

- 'None' for a non-legally liable grantee; and
  Note: most non-legally liable grantees will already be set to 'None.'

- 'Dependent Child – SSI' for a dependent under age 18

BEACON will change the Mandatory Reason to:

- 'SSI Grantee/Other Parent for grantees (including teen parent grantees) or other adult parent;

AU Manager's Responsibilities: TAFDC Recipient Receiving SSI Procedures (continued)	• "None" for a non-legally liable grantee; and **Note:** Most non-legally liable grantees will already be set to "None." • "Used for Eligibility Determination" for a dependent under age 18.

Coding the "TAFDC Recipients in Receipt of SSI" Report	For AUs listed on the "TAFDC Recipients in Receipt of SSI" report, AU Managers must review the AUs. If appropriate, action must be taken to close the recipient following instructions found in the previous section of this Field Operations Memo. If the recipient is not receiving SSI but another AU characteristic has changed (i.e. youngest child has turned nine), the AU Manager must take appropriate action to change that AU characteristic. Once action has been taken, the AU Manager must code the report by selecting one of the following actions: ✓ Closed or closing – the AP/AU was closed or is pending to close at some point since the report was run. ✓ Changed Coding receives SSI – the AP coding was completed. ✓ Not in Receipt of SSI – AP not receiving SSI, AU characteristic *may* have changed. Supervisors must review the report for completeness. Once reviewed it must be sent to the TAO Director. TAO Directors must e-mail the annotated reports to Julie Noble by September 1, 2006.

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