

From the Hotline

If you have any questions on this column or other policy and procedural material, please have your Hotline designee call the **Policy Hotline at 617-348-8478**.

The questions and answers below relate to Operations Memo 2013-48, TAFDC and EAEDC – BEACON Changes: Screening for Chronic Mismanagement of Funds. For more information, also refer to 106 CMR 706.600 through 106 CMR 706.690.

Q. 1. A family receiving TAFDC is renting an apartment and the household is behind in their rent. As I was reviewing the BEACON pages concerning possible cash mismanagement of funds, the parents stated that they never signed a lease with their landlord. Should mandatory vendor payments be established in this case?

A. 1. No. Without a signed lease, there is an increased risk of eviction and homelessness. Also, the likelihood of a landlord agreeing to an inspection is diminished, without a signed lease.

Q. 2. Since the mandatory vendor exception for the absence of a signed lease must be verified, how do I document this type of situation?

A. 2. While primary documents are often the preferred method of verification, they are not always obtainable. Remember that alternative forms of verification, such as a third party statement and/or the client's statement are also acceptable. For more information, refer to 106 CMR 702.311 and 106 CMR 702.340.

Reminder: Case managers must identify these alternative forms of documentation and assist clients in obtaining required verifications. For more information, refer to 106 CMR 702.310.

Q. 3. In addition to the example in **Q** and **A 2.** above, are there other examples of when the verification of an exception to mandatory vendor payments may be documented by a third party statement or the client's own statement?

A. 3. Yes. There are other situations such as clients who are "doubling up" with a host family, where requiring an inspection or mandating vendor payments is not practical and could increase the risk of eviction and homelessness. In situations where there are no other available forms of verification, a client's statement is acceptable. Additionally, remember that the client's statement that domestic violence is an issue is acceptable until a Domestic Violence/TAO Specialist can follow up to determine and confirm any potential risk.

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- Q. 4.** My client owes more than three months of utility payments, but when I spoke with her about the particular circumstances leading up to the arrearage, she mentioned that the past due bills accrued during her period of TAFDC closure and unemployment. Since she is currently receiving TAFDC and working part time, does she still have reasonable cause for having a utility arrearage?
- A. 4.** Yes. The client does not need to have a current reasonable cause for case managers to use the “temporary setback/emergency” option. As long as there was a temporary setback in the client’s past that contributed to the arrearage, this reasonable cause option applies.