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 Executive Office of Health and Human Services  
**Department of Transitional Assistance**  
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**Field Operations Memo 2006-19**  
**April 3, 2006**

**To:** Transitional Assistance Office Staff

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

**Re:** **Work Program Participation Review - Phase 1: Age Two Through School and Exempt AUs**

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**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; or
- who are coded as “Exempt” and whose AU characteristics *appear* to make them “Nonexempt” (for example, youngest child in AU is now two years old, but AU is coded “Exempt”).

This is the first in a series of Field Operations Memos focusing on increasing Work Program participation for TAFDC applicants and recipients. There will be additional Field Operations Memos specifically addressing increasing participation of other Work Program required AUs in the future.

This Field Operations Memo informs TAO staff of the need to conduct a desk review to determine:

- if the recipient is currently meeting the Work Program required hours;
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**Purpose of Memo (continued)**

- if not meeting the hours, why the recipient is not meeting the required hours;
- whether or not there is Good Cause for not meeting the requirement; and
- whether the “Exempt” AU should be changed to “Nonexempt.”

If the desk review identifies that the recipient:

- does not meet the Work Program requirements;
- does not have a current “Meets Compliance” or “Good Cause” reason; or
- is no longer “Exempt” and is Work Program required,

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.

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**Specifications for the Reports**

AU Managers must use the two reports e-mailed with this Field Operations Memo to determine AUs needing desk reviews/face-to-face interviews.

- The first report (“Participating Not Meeting”) captures AUs that are coded in BEACON as nonexempt, the youngest child is two years old through school age and the AP is participating in the Work Program, but not meeting the required 20 hours per week level of participation, or the AU has a “Meets Compliance” reason that has expired. The AU was not in “Sanction Interrupt” status. The report was run in March and is based on January participation information.
- The second report (“Exempt Child Over 2”) captures AUs coded as “Exempt” (with an exemption reason other than “disabled” or “ineligible noncitizen”) whose AU characteristics make it *appear* as though the AU should be nonexempt (for example, the youngest child in the AU is two years old or older).

Both reports will have 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.

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**AU Manager's Responsibilities: "Participating Not Meeting" Report**  
*Coded with "Meets Compliance"*

AU Managers must review each recipient on the "Participating Not Meeting" report to determine current participation levels (on the Monitor Participation window, if enrolled in an ESP activity or on the Employment Status window, if employed), current "Meets Compliance" reasons (on the TAFDC tab of the Work Requirements window) and current activity enrollment (on the "Plan" window of the EDP Disposition workflow).

- AU Managers must first determine whether or not the AP is currently participating in the Work Program for the required number of hours by checking the current hours on the Monitor Participation window. If the recipient **is** currently participating for the required number of hours, the AU Manager must annotate the report with "Currently participating." No additional AU Manager action is needed on the AU:
  - If the recipient is **not** currently participating for the required number of hours, the AU Manager must determine through documentation in the AU record if a "Meets Compliance" reason already exists and can be extended.
  - If after reviewing the AU record, the AU Manager finds that the "Meets Compliance" reason **still** exists, the AU Manager should annotate the report with "Meets Compliance reason/end date updated" and update the End Date field on the TAFDC tab of the Work Requirements window. No additional AU Manager action is needed on the AU.  
**Example:** If the recipient has a "Meets Compliance" reason of "No Child Care Available" with an end date of 4/01/2006 and the recipient had called the AU Manager to say that Child Care was not going to be available until the end of April, the AU Manager would annotate the report with "Meets Compliance reason/end date updated." The Meets Compliance End Date field must be updated with "4/30/2006." This must be noted on the BEACON Narratives tab.
  - If after reviewing the AU record, the AU Manager finds that the "Meets Compliance" reason **does not** exist, the AU Manager should schedule an appointment with the recipient to determine if there is a new "Meets Compliance" reason. At the interview, if there is a new "Meets Compliance" reason, the AU Manager should select the new "Meets Compliance" reason and enter a new end date on the TAFDC tab of the Work Requirements window. The AU Manager must annotate the report with "Meets Compliance reason/end date updated."
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**AU Manager's  
Responsibilities:  
"Participating  
Not Meeting"  
Coded with  
"Meets  
Compliance"  
(continued)**

This change must be noted on the BEACON Narratives tab.

**REMINDER:** "Meets Compliance" end dates can be found on the "WP Compliance End Dte" report in the "Field Ops Staff TAO Reports" on Actuate in BEACON. This report is a tool AU Managers must use to track the end dates of "Meets Compliance" reasons.

*Not Participating  
and Not Coded  
"Meets  
Compliance"*

- If the recipient no longer has a current "Meets Compliance" reason or the recipient fails to keep the appointment, the AU Manager must change the "Meets Compliance" reason on the TAFDC tab of the Work Requirements window to "Participation." This will ensure that the recipient's participation in the Work Program will be monitored. The AU Manager must annotate the report with "Meets Compliance reason changed to Participation." This change must be noted on the Narratives tab in BEACON. Ensure that all appropriate next steps are taken to enroll the recipient in an ESP component or to refer him or her to Community Service following established procedures
- If the recipient is neither currently meeting the Work Program nor has a current/new "Meets Compliance" reason, the AU Manager must determine if the recipient has either a "short term" (lasting less than 30 days) reason or a "long term" (lasting more than 30 days) reason which prevents the recipient from meeting the Work Program:
  - ♦ If the reason is "short term" and it is expected that the recipient will be meeting participation requirements, the AU Manager must annotate the report with "Good Cause < 30 days."
  - ♦ If the reason is "long term" the AU Manager should explore the necessity for a "Meets Compliance" reason. Once verified, the AU Manager should select the appropriate "Meets Compliance" reason from the Compliance field of the TAFDC tab of the Work Requirements window and enter an end date. If the "long term" reason is the same as the current "Meets Compliance" reason, extend the end date for *no more than* six months from the current date. The AU Manager must annotate the report with "Meets Compliance reason/end date updated."
- If there is no "Good Cause" situation, the AU Manager must schedule an appointment for the recipient to discuss the need to increase participation hours and if necessary to enroll him or her in an activity that will help him or her meet the Work Program hours.

**AU Manager's Responsibilities:**  
**"Participating Not Meeting"**  
*Not Participating and Not Coded "Meets Compliance"*  
**(continued)**

- If the recipient *does not* keep the appointment, the AU Manager must annotate the report with "Appointment not kept." 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. The AU Manager must determine if the recipient is in a "Sanction Interrupt" mode and take appropriate action to resume the sanction process following procedures in Field Operations Memo 2005-8.
- If the recipient *does* keep the appointment, the AU Manager must explore whether the recipient can increase his or her participation at the current activity. If not, the AU Manager must enroll the recipient in another activity that will help him or her meet the Work Program hours. The activity may be in combination with a current activity that combined meets the 20 hour Work Program hourly requirement or may be a new activity that meets the 20 hour Work Program hourly requirement. The AU Manager must annotate the report with "Enrolled/increased hours to meet WPR." This change must be noted on the BEACON Narratives tab.

**Important:** If when reviewing the AU, the AU Manager determines that the AU has not been reviewed within one year or the AU should be coded with another Work Program reason, a reevaluation must be scheduled to review eligibility and ensure that he or she is meeting the Work Program.

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**“Participating  
Not Meeting”  
Report/  
Annotating the  
Report**

The “Participating Not Meeting” report is sorted by TAO and AU Manager name. 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 **May 15, 2006**.

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

- if the recipient is currently exempt or found to be exempt after either the desk review or face-to-face review, the AU Manager should select: “Exempt.”
  - If the recipient is currently closed, pending to close or does not keep the eligibility review appointment, the AU Manager should select: “Closed or Closing.”
  - if the recipient is currently meeting the Work Program hours, the AU Manager should select: “Currently participating.”
  - if the recipient’s “Meets Compliance” situation is continuing, the AU Manager should select: “Meets Compliance reason/end date updated.”
  - if the recipient has a “Good Cause” reason expected to last less than 30 days, the AU Manager should select: “Good Cause < 30 days.”
  - if the recipient is coded with a “Meets Compliance” reason that is no longer valid or the recipient failed to keep the appointment to explore continuing eligibility for a “Meets Compliance” reason, the AU Manager must annotate the report with “Meets Compliance reason changed to “Participation.”
  - if the recipient has neither a “Meets Compliance” reason nor a “Good Cause” reason for meeting the Work Program and the recipient has enrolled in an activity or increased his or her participation to meet the required hours, the AU Manager should select: “Enrolled/increased hours to meet WPR.” and
  - if the recipient does not keep the appointment, the AU Manager should select: “Appointment not kept.” These AUs must not be closed.
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**AU Manager's Responsibilities:  
Exempt Child Over 2 Report**

AU Managers must review each recipient on the "Exempt Child Over 2" report to determine if the AU exemption reason is still valid, if the exemption reason has changed or if the AU exemption reason no longer exists and the AU is nonexempt (and the AP is Work Program required).

AU Managers must perform a desk review to determine whether or not the AU is currently "Exempt." A list of exemptions is found at 106 CMR 203.100 (A).

If the AU is exempt or has another exemption reason other than the one currently entered on BEACON, AU Managers must ensure that the correct exemption reason is entered on BEACON. This means the Exemption Status field on the AU Exemption Tab of the Work Requirements window must be "Exempt" and the Reason field must be either: "Exempt," "Pending Disability Review," or "Participating in FEP." The TAFDC tab of the Work Requirements window must have the "Work Program Required" radio button set to "No" and the appropriate Required Status Reason selected from the drop-down list.

The AU Manager must also ensure that other windows on BEACON accurately reflect the current AU exemption.

**Examples:** If the AU is now exempt due to the AP being disabled, the Disability window must be completed for the AP.  
If the AU is exempt due to the AP being over the age of 60, the AP's Date of Birth on the Household window must reflect the AP's age as 60 years old or older.

If the AU is no longer exempt, the AU Manager must schedule an appointment for the recipient to explain to him or her that he or she is now Work Program required. AU Managers must also check to see if the recipient has used the 60 day work search period or if the recipient has 60 days from the date of the appointment to meet the Work Program requirement. The Good Cause reasons for failure to meet the Work Program requirement (see 106 CMR 701.380 (A)) must be explained to the recipient.

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**AU Manager's  
Responsibilities:  
Exempt Child  
Over 2 Report  
(continued)**

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 the Start Date and End Date of the 60-day Work Search Period in the 60-day Work Search Period Begin and End Date fields. This must be noted on the BEACON Narratives 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;
- 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;
- 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.

The recipient is now Work Program required and has 60 days to meet the Work Program.

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**Exempt Child  
Over 2 Report /  
Annotating the  
Report**

The "Exempt Child Over 2" 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 **May 15, 2006**.

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

- If the AU needs to be closed (for failure to keep the appointment or another eligibility reason, the AU Manager must select: "Closed or Closing."
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**Exempt to  
Nonexempt  
Report /  
Annotating the  
Report  
(continued)**

- 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 AU remains exempt after a face-to-face interview, the AU Manager should select: "Reviewed - Remains Exempt."
  - If the AU is no longer exempt after a face-to-face interview, the AU Manager should select: "Reviewed - Change to Nonexempt."
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**AU Requiring a  
Reevaluation**

If when reviewing the AU, the AU Manager determines that the AU has not been reviewed within one year or the AU should be coded with another Work Program reason, 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.

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**Questions**

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

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