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*Executive Office of Health and Human Services*  
**Department of Transitional Assistance**  
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**Field Operations Memo 2008-53 A**  
**October 24, 2008**

**To:** Transitional Assistance Office Staff  
**From:**  John Augeri, Assistant Commissioner for Field Operations  
**Re:** TAFDC – Work Program Requirement Changes

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**Overview**

As a result of changes to Federal work participation rules, effective October 1, 2008 the Department changed how it counts clients' work program participation in the following areas:

- homework/study time counts towards overall participation in certain education and training activities;
  - post-secondary education beyond an Associate's degree (including Bachelor's and Graduate Degree programs) meets the work program requirement (provided the client has not already exceeded the 12-month limit of education or training activity to meet the work program);
  - child support counts in the Fair Labor Standards Act (FLSA) calculation when determining community service participation limits; and
  - the Job Search/Job Readiness counter is activated during a client's first weeks in a Supported Work – Job Search/Job Readiness activity.
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**Purpose of Memo**

This Field Operations Memo tells case managers about policy and procedural changes as they relate to work program participation.

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**Obsolete Memos**

Field Operations Memo 2005-29: "TAFDC – Education/Training Counter: Vocational Proficiency Indicator," Field Operations Memo 2008-42: "TAFDC - Employment Services Program (ESP) Regulation Change" and Field Operations Memo 2008-50 "TAFDC – Work Program Requirement Changes" are now obsolete. Field Operations Memo 2008-53 is also obsolete due to an error in referencing a Field Operations Memo to be obsolete.

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**Homework/Study  
Time and  
Educational  
Activities**

Effective with BEACON Release 2.1.24 (scheduled for October 27, 2008), for each hour (or credit hour, if in college) a client participates in an education or training activity that has been entered and updated on the Monitor Participation window on BEACON, one hour of homework and study time will be automatically added by BEACON to the actual hours of participation (effectively doubling the client's participation in the activity). The education or training components covered by this change are:

- Skills Training;
- Post-secondary education (including the new activity "College (4 Year)");
- Advanced Degree (a new component); and
- Basic Education and YPP.

On or after November 1 when case managers receive *Participation and Attendance* forms and enter hours into BEACON for clients participating in an education or training activity, BEACON will automatically double the hours of participation.

**Example:** Mary Smith returns her *Participation and Attendance* form on November 10. She is in a skills training activity for 20 hours per week. Mary participated in the activity as follows: 1<sup>st</sup> week: 20 hours; 2<sup>nd</sup> week: 20 hours; 3<sup>rd</sup> week: 15 hours and 4<sup>th</sup> week: 20 hours. Mary Smith's case manager enters the *actual hours of participation* on the Monitor Participation window in BEACON. BEACON doubles Mary's hours to the following totals: 1<sup>st</sup> week: 40 hours; 2<sup>nd</sup> week: 40 hours; 3<sup>rd</sup> week: 30 hours and 4<sup>th</sup> week: 40 hours.

When a case manager clicks on "Update" on the Monitor Participation window, an edit message will appear to remind the case manager of the doubling of hours. The edit message states: "*The system has doubled the participation hours you have entered to account for study time.*" The doubled hours will appear in the "Total Participation Hours" field on the Monitor Participation window.

Some clients may be currently participating in another activity in addition to an education or training activity to meet their work program requirement. Because the hours of participation in an education or training activity are now doubled, these clients may no longer need to participate in another activity (in addition to the education or training activity) to meet the work program requirement. At the next client contact or the next time a client's EDP is updated, case managers must:

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**Homework/Study Time and Educational Activities (continued)**

- check the Ed/Training counter on the TAFDC tab of the Work Requirements window to ensure that the counter has not reached “12” (in which case the client may continue in the education or training activity);
  - tell the client that homework/study time counts towards his or her participation at a rate of one hour per every hour participated in an education or training activity and that he or she may not need to participate in the other activity to meet the work program;
  - if the activity (other than education or training) is not needed by the client to meet the work program requirement, ask the client if he or she would like to continue in that activity; and
    - **Important:** Case managers may advise clients about continuing in the activity based on factors such as: the activity helps the client reach self-sufficiency, the activity offers work experience to the client. However, it is the client’s decision to determine whether he or she would like to continue in the activity.
  - based on the client’s decision, modify the EDP following established procedures.
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**Graduate and Bachelor’s Degrees**

State Letter 1339 allows for post-secondary education beyond the Associate’s Degree to count towards the work program requirement. This change in policy was effective October 1, 2008. Applicants and clients who have not exceeded the 12-month limit of an education or training activity to meet the work program requirement who enroll in Post Secondary Education or Advanced Degree, can have the activity count towards their work program requirement.

**Important:** Currently, the Department of Early Education and Care (EEC) does not offer child care to clients attending school beyond a baccalaureate level unless they are participating in another activity. Those clients participating in another activity are eligible for part-time child care for that activity only.

An applicant or client must have a high school diploma or a GED to enroll in an Associate’s or Bachelor’s Degree program. An applicant or client must have a Bachelor’s Degree to enroll in a Master’s or Graduate’s Degree program. The grade level must be reflected on the Education window on BEACON. Prior to enrolling an applicant or client in Post Secondary Education or Advanced Degree, case managers must review the Education/Training counter found on the “TAFDC” tab of the Work Requirements window.

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**Graduate and  
Bachelor's  
Degrees  
(continued)**

Applicants or clients who have used the 12-month limit of an education or training activity to meet the work program requirement may still enroll in Post Secondary Education or Advanced Degree; but the case manager must inform these applicants or clients that they must enroll and participate in another activity to meet the work program requirement or risk being sanctioned.

**Reminder:** Applicants or clients must have the appropriate level of education and have that be reflected on the Education window on BEACON to enroll in Post Secondary Education or Advanced Degree chosen to meet the work program requirement.

State Colleges, Community Colleges and four-year colleges have been entered as Resources onto BEACON. Case managers may enroll clients in education beyond an Associate's Degree by selecting "Post Secondary Education" as the component and "College (4 Year)" as the activity or "Advanced Degree" as the component and "Graduate Level" as the activity, depending upon the activity in which the client wishes to enroll.

Field Operations Memo 2008-42, instructed TAO staff to call the Policy Hotline for instructions to process cases wishing to enroll in post-secondary education beyond the Associate's Degree prior to October 1. The TAOs who have enrolled these clients in post-secondary education will be contacted by Central Office for further processing instructions.

If a client wishes to enroll in a college that is **not** currently listed as a resource, the case manager must have the Hotline Designee call the Policy Hotline to have the resource added to BEACON. A referral can be made to that college the next day.

**Important:** Clients must be told that they have the responsibility to pay the college tuition and all fees for programs that are not funded by the Department. The client may apply for financial aid from the college to pay for tuition and fees.

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**Vocational  
Proficiency  
Indicator  
Functionality  
Eliminated**

Effective with BEACON Release 2.1.24 (scheduled for October 27, 2008) case managers no longer need to check the Vocational Proficiency indicator when enrolling a client in a non-degree education or training program at a two-year college. Case managers had to do this to have the education or training program count towards the 12-month limit of an education or training activity meeting the work program requirement. BEACON will now do this automatically.

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**New FLSA  
Calculation**

Effective with BEACON Release 2.1.24 (scheduled for October 27, 2008), an absent parent's child support order amount less the absent parent's DEFRA payment amount (paid on the 15<sup>th</sup> of each month based on the previous month's child support payment) will be included in the Fair Labor Standards Act (FLSA) calculation when determining the hours of community service that the client may participate. The FLSA hours will continue to display on the "ESP Referral Disposition" window, on the "Summary tab-  
"WP Participation" tab and on the "What If..." window "Calculation" tab.

*For clients without absent parent Child Support Obligation Amounts, there is no change to the FLSA calculation.*

*For clients with absent parent Child Support Obligation Amounts, the following calculation will be performed by BEACON to determine the FLSA hourly calculations for clients who are work program required. BEACON will:*

1. determine child support monthly amount (DOR Obligation Amount).
2. subtract the DEFRA amount paid to the client, if applicable, from the DOR obligation amount.
3. subtract the remaining child support amount (#2) from the client's TAFDC monthly grant.
4. add the client's FS monthly amount to the remainder (#3).
5. divide the amount in #4 by the current Massachusetts' minimum wage.
6. divide that amount by 4.333.

This calculation will determine the maximum weekly hours a client can participate in community service. If an applicant or client is interested in community service, he or she must be informed of the number of hours he or she may participate in community service.

*If the FLSA hours meet or exceed the applicant's or client's work program requirement, the applicant or client may perform community service to meet the work program requirement.*

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**New FLSA  
Calculation  
(continued)**

*If the FLSA hours are less than the applicant's or client's work program requirement, the applicant or client must meet the work program requirement by working for the **entire** hourly work program requirement, or participating in another ESP activity for the **entire** hourly work program requirement; or working or participating in another ESP activity in combination with community service to meet the work program requirement. These clients are listed on the BEACON View: "ESP APs Requiring an Appointment for FLSA."*

For complete details on the FLSA calculation, case managers should continue to follow instructions in Field Operations memo 2008-4. That memo will be reissued in the near future with the information on child support obligation amounts being included in the FLSA calculation.

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**New FLSA  
Calculation:  
"What If..."  
Calculation**

The "What If..." window "Calculation" tab displays the FLSA hours based on the income entered and the projected TAFDC and FS amounts used in the calculation. Case managers can refer to the FLSA hours before making a Community Service referral for applicants or reopened clients.

*For clients without absent parent Child Support Obligation Amounts, there is no change to the FLSA calculation on the "What If..." window.*

*For clients with absent parent Child Support Obligation Amounts, the child support order must be entered on the "Other Income" tab.*

In the "Type" dropdown box, select "Support."

**Important:** Do not select "Child Support" from this dropdown box as the child support amount will not be included in the FLSA calculation.

In the "Amount" field, enter the child support obligation amount(s) for all absent parents (found on the "DOR/CSE Child Support Data" report on the ViewDirect option on the Mainframe or on Document Direct if the case exists). Once all other information is entered and the case manager clicks on the "Calculate" button, the FLSA hours will appear in the bottom left hand side of the "Calculation" tab.

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**New FLSA  
Calculation:  
Absent Parent  
Information**

Effective with BEACON Release 2.1.24 (scheduled for October 27, 2008), a BEACON batch job will update fields for active TAFDC AUs on the “Agreement” tab of the “Absence” window to give case managers the child support obligation amount information used in the FLSA calculation. The information to be populated on the Absence window is as follows:

- If there is a current Absence record (Absence radio button is marked as “Yes”) on BEACON with an Agreement amount and a new or updated obligation amount that is on the DOR-CSE file, the following fields on the “Agreement” tab for that absent parent will be updated:
    - Obligation Amount;
    - Frequency; and
    - Start Date (Court Order Date)
  
  - If there is a current Absence record on BEACON without an Agreement record and a new obligation amount that is greater than \$0.00 on the DOR-CSE file, the following fields on the “Agreement” tab for that absent parent will be updated:
    - Obligation Amount;
    - Frequency;
    - Start Date (Court Order Date);
    - Agreement will be switched to “Yes”;
    - Agreement Type will be switched to “Court Ordered.”
  
  - If there is not a current Absence record (Absence radio button is marked as “No”) on BEACON but an Absence record previously existed for that absent parent and a new or updated obligation amount that is greater than \$0.00 for that absent parent is on the DOR-CSE file, the Absence record on BEACON will change from “No” to “Yes” for that absent parent and the following fields on the “Agreement” tab for that absent parent will be updated:
    - Obligation Amount;
    - Frequency;
    - Start Date (Court Order Date);
    - Agreement will be switched to “Yes” if applicable;
    - Agreement Type will be switched to “Court Ordered” if applicable.
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**New FLSA  
Calculation:  
Absent Parent  
Information  
(continued)**

- If multiple current Absence records are on BEACON (more than one Absent Parent) with multiple obligation amounts, then each Absence record will be updated with the appropriate DOR-CSE obligation data in the following fields on the “Agreement” tab for that absent parent:
  - Obligation Amount;
  - Frequency;
  - Start Date (Court Order Date);
  - Agreement will be switched to “Yes”;
  - Agreement Type will be switched to “Court Ordered.”

The batch job will not create a new Absence record if an Absence record has never existed on BEACON for a particular absent parent, even if an obligation amount currently exists for that absent parent on the DOR-CSE file.

**Note:** Prior to any reevaluation interview, case managers should check the “DOR/CSE Child Support Data” report on the ViewDirect option on the Mainframe or in Document Direct to determine if new information exists. If new information does exist, the case manager must discuss it with the applicant/client and create a new “Absence” record with this information.

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**Job Search/Job  
Readiness  
Counter and  
Supported Work**

Effective with BEACON Release 2.1.24 (scheduled for October 27, 2008), clients who enroll in a Supported Work – Job Search/Job Readiness activity will have the Job Search/Job Readiness counter activated for the first weeks of the activity. Case managers are reminded that the Job Search/Job Readiness activity can only count towards the Federal work participation rate for six weeks (of which only four of those weeks may be consecutive) per year and every year thereafter. However, the client who has already used the six weeks of participation within the year still meets the state work program requirement if fully participating in Job Search/Job Readiness beyond the six-week limit.

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**Questions**

If you have any questions, please have your Hotline designee call the Policy Hotline.

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