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Field Operations Memo 2006-27
May 22, 2006

To: Transitional Assistance Office Staff
From: *CD* Cescia Derderian, Assistant Commissioner for Field Operations
Re: **Work Program Participation Review - Phase 2: Age Nine and Older; Authorizing Batch Sanctions and Removing Interrupted Sanctions – Phase 2**

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.

REMINDER: AU Managers should use their “Child Turning 6 and 9” View to monitor the changes in the AP’s work program requirement.

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.” This is the second in a series of Field Operations Memos focusing on increasing Work Program participation for TAFDC applicants and 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 through school” or “Youngest Child school through 8 ” should be changed to “Youngest Child 9 or older.”

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

**Purpose of
Memo
(continued)**

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.

Additionally, this Field Operations Memo provides a follow-up to Field Operations Memo 2006-13: "TAFDC – Removing Interrupted Sanctions."

**Specifications
for the
"Nonexempt
Child 9 or Older"
Participation
Report**

The report relating to increasing participation for the AUs with a child age 9 and older 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 9 or Older" captures APs coded as "Youngest Child 2 through school" or "Youngest Child school through 8" whose AP characteristics make it *appear* as though the AP should be coded "youngest child 9 or older."

This report will be similar to those issued with Field Operations Memo 2006-19, 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 9 or Older"

AU Managers must review each recipient on the "Nonexempt Child 9 or Older" 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 9 or Older" 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 9 or Older."

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 9 or Older" 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 (30 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 30 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.

Once these 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 9 or Older";
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AU Manager's Responsibilities: "Nonexempt Child 9 or Older" (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 30 hours per week. BEACON will require the 30 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 24 hours per week, a sanction is created because she did not meet the new 30 hour requirement. Mary's AU Manager removes the sanction following instructions above. If Mary does **not** meet the 30 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 9 or Older"
(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;
 - ◆ ensure the nonexempt reason on the Required Status Reason drop down box is changed to "Youngest Child 9 or Older";
 - ◆ 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 30 hours per week. This action must be noted on the BEACON Narratives tab.

**Annotating the
“Nonexempt
Child 9 or Older”
Report**

The “Nonexempt Child 9 or Older” 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 **June 30, 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, 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 Pend 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 Pend 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.
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**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 the 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 **June 30, 2006**.

Questions

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