

**DSS ADMINISTRATIVE LETTER ECONOMIC AND FAMILY SERVICES 10-2020
EFS_WF_AL-10-2020 (Amended)**

Work First Program

TO: County Directors of Social Services

ATTENTION: Work First Program Administrators,
Managers and Supervisors

DATE: April 22, 2020

SUBJECT: Work First Cash Assistance Sanctions (Amended)

EFFECTIVE DATE: Upon receipt

I. GENERAL INFORMATION

The Division of Social Services will temporarily suspend Work First cash assistance sanctions related to non-cooperation with child support and/or failure to perform work requirements beginning with the benefit month of March 2020 in response to the COVID-19 public health emergency declaration issued by the Secretary of Health and Human Services. This letter is being amended from the original letter issued on April 14, 2020 to update information in the Implementation Procedures provided in this letter regarding sanctions.

II. POLICY PROCEDURES

Applicants and recipients with active Work First sanctions for failure to cooperate with child support and/or failure to meet the work requirements are eligible to receive Work First Cash Assistance if all other eligibility requirements are met.

Effective immediately, Work First (WF) cash assistance eligibility for applications, changes or recertifications should be determined without consideration to existing Work First cash assistance sanctions.

- Active WF cash sanctions for existing cases for these specific reasons must be suspended in the North Carolina Families Accessing Services through Technology (NC FAST) system. The specific NC FAST sanctions related to child support and/or failure to meet work requirements are listed in the attached document: Work First Sanctions Related to Child Support or Work First Work Requirements.
- The eligibility rules for new applications in NC FAST for Cash Assistance does not capture existing sanctions for individuals. Sanctions rules apply when the case is created. Sanctions related to these specific issues will need to be suspended once the case is created.
- Applicants who fail to cooperate with child support or meet the work requirements who do not have existing sanctions in NC FAST, will not be sanctioned until the COVID-19 public health emergency period ends.
- NC FAST will produce and post a report in FAST Help that identifies active and pending closure cash assistance cases that currently have a Work First cash assistance sanction beginning with the month of March and each month thereafter until the COVID-19 public health emergency period ends.

- A communication will be sent to counties from NC FAST when the report is available in FAST Help.
- Once the report is posted in FAST Help, counties must review and end date the sanctions on the active Work First cash assistance cases.
- After the COVID-19 public health emergency declaration is lifted, NC FAST will reinstate the remaining sanction period for cases that had sanctions suspended during this period.

III. IMPLEMENTATION PROCEDURES

When the COVID-19 public health emergency declaration ends, NC FAST will reinstate all sanctions suspended for the specified reasons during the COVID-19 public health emergency period that have months remaining.

Sanctions for new applications must be created and entered in NC FAST by county staff for the appropriate period of time with a future start date of 12/1/2021. NC FAST will modify the sanctions created with a future date of 12/1/2021 for the specified reasons to the appropriate sanctions period. NC FAST will update the sanctions to start effective the first of the month following the month in which the COVID-19 public health emergency declaration issued by the Secretary of Health and Human Services is lifted.

IV. EFFECTIVE DATE

This policy is effective upon receipt. All provisions implemented will be allowed until the COVID-19 public health emergency declaration by the Secretary of Health and Human Services is lifted. Submit any questions regarding this policy to the Operational Support Team (OST) at DSS.Policy.Questions@dhhs.nc.gov.

Sincerely,



David Locklear, Deputy Director
Economic and Family Services

DL/lmd

Attachment (1):

Work First Sanctions Related to Child Support or Work First Work Requirements