

**DSS ADMINISTRATIVE LETTER ECONOMIC AND FAMILY SERVICES 11-2020
EFS_WF_AL-11-2020 (Amended)**

Work First Program

TO: County Directors of Social Services

ATTENTION: Work First Program Administrators,
Managers and Supervisors

DATE: April 28, 2020

SUBJECT: Temporary Suspension of Work First Cash Assistance
Terminations (Amended)

EFFECTIVE DATE: Upon Receipt

I. GENERAL INFORMATION

Terminations of Work First (WF) Cash Assistance (CA) cases are temporarily suspended in relation to time clocks and paperwork or procedural requirements through the end 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. Work First terminations should not be entered into the North Carolina Families Accessing Services through Technology (NC FAST) system. The temporary suspension of terminations applies **only** to cases terminated March 31, 2020 and forward. This administrative letter is amended to include corrected instructions on the appropriate notices to use and to provide further instruction on the termination process.

II. POLICY PROCEDURES

A. NC FAST will:

1. Produce and post a report in FAST Help identifying cash assistance cases terminated effective March 31, 2020 and forward due to the following reasons:

Time Clock Limit Reached:

24-Month State clock limit reached.
60-Month State clock limit reached.
60-Month Federal clock limit reached.

Paperwork or Procedural Terminations:

Client failed to sign the Mutual Responsibility Agreement (MRA).
Client did not request Cash Assistance for all mandatory individuals.
Failed to apply for other required benefits.
Failed to provide proof of citizenship/identity.

2. Issue a communication notifying counties when the reports are available in Fast Help.

B. Case Mangers will:

Suspend Terminations During the Public Health Emergency by reactivating time clock and paperwork or procedural terminations by doing the following:

1. Reactivating Time Clock Terminations:

- a. To reactivate cases closed due to the exhausted time clocks, case managers must reactivate the Product Deliver Case (PDC) if the family meets all other eligibility requirements and add the appropriate extension evidence:
 - Federal hardship extension
 - State 60-month hardship extension
 - State 24-month hardship extension

Refer to the Job Aid: Entering Work First Time Limit Extension Evidence.

- b. Case managers must document on the Income Support Case Details tab: ***“Temporary Suspension of Time limit Terminations Due to COVID-19.”*** Use of this exact terminology must be used to allow NC FAST to create a report to identify the cases with suspended terminations when COVID-19 is lifted. This report will be used to ensure that all cases with suspended terminations are terminated accordingly. Cases not terminated within the established time frame when COVID-19 is lifted will result in a county overpayment.
- c. Case managers must send a DSS-8108 to inform recipients their case has been reactivated. This notice must be sent for reactivations of cases that terminated due to time clock limits and paperwork or procedural requirements. See the attached DSS-8108 for guidance on the appropriate language to use.

2. Reactivating Paperwork or Procedural Terminations:

- a. To reactivate cases terminated due to paperwork or procedural requirements, case managers must reactivate the PDC following all NC FAST requirements if the family meets all other eligibility requirements. For assistance refer to the Job Aid: Completing Manual Reactivations.
- b. Case managers must document on the Income Support Case Details tab: ***“Temporary Suspension of Paperwork/Procedural Terminations Due to COVID-19.”*** Use of this exact terminology must be used to allow NC FAST to create a report to identify the cases with suspended terminations when COVID-19 is lifted. This report will be used to ensure that all cases with suspended terminations are terminated accordingly. Cases not terminated within the established time frame when COVID-19 is lifted will result in a county overpayment.
- c. Case managers must send a DSS-8108 to inform recipients their case has been reactivated. This notice must be sent for reactivations of cases that terminated due to time clock limits and paperwork or procedural requirements.

NOTE: Hardship extension requests and hearings for cases terminated March 31, 2020 and forward due to an exhausted time clock are not required during the COVID-19 public health emergency declaration.

3. Suspending Time Clock Terminations:

- a. Case managers will not terminate cases due to time clock exhaustions during the COVID-19 public health emergency.
- b. Case managers must add the appropriate extension evidence if the family meets all other eligibility requirements. For assistance refer to the Job Aid: Entering Work First Time Limit Extension Evidence.

- c. Case managers must document on the Income Support Case Details tab: ***“Temporary Suspension of Time limit Terminations Due to COVID-19.”*** Use of this exact terminology must be used to allow NC FAST to create a report to identify the cases with suspended terminations when COVID-19 is lifted. This report will be used to ensure that all cases with suspended terminations are terminated accordingly. Cases not terminated within the established time frame when COVID-19 is lifted will result in a county overpayment.
- d. Case managers must send a DSS-8108 to inform recipients their case has been reactivated. This notice must be sent for reactivations of cases that terminated due to time clock limits and paperwork or procedural requirements. See the attached DSS-8108 for guidance on the appropriate language to use.

4. Suspending Paperwork and Procedural Terminations:

- a. Case managers will not terminate active cases due to paperwork or procedural requirements during COVID-19.
- b. Case managers must inform recipients of the temporary suspension of terminations and cases subject to termination will terminate the month following the end of the suspension.
- c. Case managers must request pending information using the DSS-8146A.
- d. Case managers must document on the Income Support Case Details tab: ***“Temporary Suspension of Paperwork/Procedural Terminations Due to COVID-19.”*** Use of this exact terminology must be used to allow NC FAST to create a report to identify the cases with suspended terminations when COVID-19 is lifted. This report will be used to ensure that all cases with suspended terminations are terminated accordingly. Cases not terminated within the established time frame when COVID-19 is lifted will result in a county overpayment.

C. Imposing Terminations Once the Public Health Emergency is lifted:

1. Time Clock Terminations:

- a. NC FAST will automatically reinstate time clock terminations the end of the month following the month in which the COVID-19 public health emergency declaration is lifted. Case reactivated due to COVID-19 with the specific termination language indicated above documented on the income support case details tab, will be automatically closed by NC FAST. Cases reactivated without the specific language indicated above must be manually terminated by the case manager within the established time frames or failure to terminate will result in a county overpayment.
- b. NC FAST will automatically send a one-time DSS-8110 to notify households of time clock terminations for the cases that it automatically terminates. Case Managers must manually send a DSS-8110 if the case is not automatically closed by NC FAST.

2. Paperwork or Procedural Terminations:

- a. Case managers must manually reinstate paperwork or procedural terminations. NC FAST will produce a report to identify the cases where terminations were temporarily suspended to assist case managers with termination of these cases. NC FAST will identify the cases based on the specific language indicated above documented on the income support case details tab. For cases manually reinstated without the specific

language on the income support case details tab, case managers must manually track and terminate those cases. Failure to terminate those cases within the specified timeframe will result in county overpayments. For assistance refer to the Job Aid: Closing a Case to manually close the PDC, and the Job Aid: Working With Changed Decisions.

- b. Case managers must send a DSS-8110 Timely Notice to inform households their case will terminate and use the DSS-8110 modal to close the PDC.

III. IMPLEMENTATION PROCEDURES

WF cases that meet the criteria for temporary suspension must be reactivated if the case terminated. Active cases should not be terminated for time clock exhaustion or paperwork or procedural requirements during the COVID-19 public health emergency. Failure to use the exact text *italicized* above may result in a County Responsible Overpayment. Appropriate notices must be sent.

WF cases that meet the criteria for termination at the end of the COVID-19 period must be terminated in NC FAST the end 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. Failure to close cases required to terminate will result in issuance of an overpayment.

IV. EFFECTIVE DATE

This policy is effective upon receipt. All provisions implemented will be allowed until the end 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. 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/klg

Attachment (1)
COVID-19 DSS-8101