



Department of Human Resources
311 West Saratoga Street
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FIA INFORMATION MEMO

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**TO: DIRECTORS, LOCAL DEPARTMENTS OF SOCIAL SERVICES
DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT
FAMILY INVESTMENT SUPERVISORS AND CASE MANAGERS**

FROM: CHARLES E. HENRY, ACTING EXECUTIVE DIRECTOR

**RE: REMINDERS FOR STATE-FUNDED TCA GROUPS, 24-MONTH WORK
REQUIREMENT, ATTENDANCE DATA, FAMILY INDEPENDENCE
PLANS, AND WO MIS AND CARES CODING**

PROGRAM AFFECTED: TEMPORARY CASH ASSISTANCE

ORIGINATING OFFICE: OFFICE OF POLICY, RESEARCH AND SYSTEMS

SUMMARY:

Action Transmittal #99-05 describes the reporting process used to identify Temporary Cash Assistance (TCA) customers that are nearing the 24-month time limit. Action Transmittal #99-18 provides local departments with reminders, clarifications and new expectations regarding TCA customers reaching the 24-month time limit. Action Transmittal # 99-32 identifies Maryland's state-funded TCA customer groups, the time limits, work requirements and CARES coding for those groups. Action Transmittals #99-46 and #99-48 identify two new state-funded TCA groups and instructions for CARES coding.

In September 2000, the Family Investment Administration conducted a case review of customers in 19 local departments who had received TCA for more than twenty-four months between January 1997 and March 2000. The results of the 24-month case review demonstrate that local departments are successfully placing most customers into activities consistent with their Independence Plans. The review also indicates that local departments are not placing 100% of the required customers into activities.

This Information Memo restates the 24-month work requirements, reviews CARES coding for state-funded TCA cases, reemphasizes the importance of correct coding on WO MIS and CARES, and reiterates local management responsibilities for distributing action

transmittals and providing or requesting training for local department staff on TCA policy and procedures. Local departments may request initial or refresher training from FIA's Bureau of Policy and Training.

In the following summaries, various Action Transmittals (AT) and CARES Bulletins are cited. These ATs and Bulletins are provided for your convenience to obtain detailed policy and procedures for the topics covered in the summaries.

□ **State-Funded TCA Cases (AT#99-32, AT#99-46, AT#99-48 & CARES Bulletin #01-02)**

Certain customer groups are in state-funded TCA programs. These groups were created to better serve certain groups of customers and remove some requirements of the federal TANF program. In addition, TCA adults and children with long-term disabilities (medicals of 12 or more months or consecutive medicals that equal 12 or more months) must be in the DEAP/TCA program to ensure that their applications for SSI or SSDI are complete and filed timely.

The following TCA cases are in state-funded TCA programs: certain immigrant families, families with a 19-year-old student, victims of family violence, long-term disabled adults/children, non-parent caretaker relatives (included in the AU), two-parent households, and adults with earnings. These cases have specific fields on CARES that require correct coding for exemption from specific federal requirements and for reporting purposes.

□ **24-Month Work Requirement (AT#99-05 & AT#99-18)**

Under PRWORA, customers receiving assistance through the Temporary Assistance to Needy Families (TANF) block grant must engage in work, as defined by the state, once the person is determined ready to work, or once the person has received assistance for 24 months (whether consecutive or not), whichever is earlier.

EXAMPLE:

A TCA customer is needed in the home to care for a household member (not included in the TCA grant) such as, mom or dad. This could also be caring for the person in the person's own home. The TCA customer **would not be exempt** from work activities but caring for the person would be the **work activity**. The local department must get verification from the ill person's doctor that the TCA customer is needed in the home and what activities are required (i.e., bathing, preparing meals, administering medication, taking to doctor's appointments, etc). An update from the doctor is required at least every six months. The work activity code on WO MIS is **OTA**.

The LDSS's have great flexibility in defining work activities, and are expected to have sufficient work activities for their customers who have received 24 or more months of TANF funded benefits since (and including) January 1997. As of January 1, 1997, every customer who reaches the 24-month time limit is required to be:

- In a work activity
- In a conciliation process or
- No longer receiving Temporary Cash Assistance.

Customers are entitled to one 30-day conciliation period for non-compliance with work requirements. Local departments may extend a customer's conciliation process for up to 90 days immediately following the 24th month of benefits

There are **no exemptions** to the 24-month work requirement. Note that the **only exception** to the 24-month work requirement is a single parent caring for a child under the age of 6 who is unable to obtain child care for one or more of the following reasons:

- Unavailability of appropriate child care within a reasonable distance from the parent's home or work site.
- Unavailability or unsuitability of informal child care by a relative or others.
- Unavailability or unsuitability of appropriate and affordable formal child care arrangements.
- Customers with this problem are considered to be in a work activity called "Seeking Child Care" and are coded OTZ on WO MIS.

□ **Attendance Data (AT#97-66 Revised, AT#97-67 & AT#00-39)**

Local departments are encouraged but not required to enter attendance data in WO MIS for all customers. However, local departments are required to collect timely and accurate attendance information for all customers engaged in federal, state or locally defined activities.

Attendance data must be collected each month. Local departments have the flexibility of developing their own methods to collect the monthly attendance data. This can include telephone calls, customer statements, attendance records, time sheets, etc.

Attendance data is required on WO MIS for all two-parent families and for any case selected as part of the TANF Federal Reporting Sample.

□ **Family Independence Plans (AT#97-24 & AT#97-66 Revised)**

The TCA application process requires an assessment of an applicant's reasons for applying, education, work history, job readiness, job skills, training interests and family resources to facilitate independence. All of these elements impact the customer's Family Independence Plan (required for each TCA case).

A Family Independence Plan is where the case manager and the TCA customer formulate and agree in writing on what activities the customer must do and what support services the local department provides to enable that customer's family to become independent of welfare. Expectations are tailored to the individual customer. If the expectations set forth

in the agreement are met, the LDSS has the flexibility to count meeting those expectations as complying with the 24-month work activity to ensure that customers do not lose benefits.

As the customer's activities change or the local department's supports change, the Family Independence Plan must be updated or a new Plan formulated that includes the changes. In addition, CARES and/or WO MIS **must be updated** (delete or add) to reflect the new activity codes for changes in the customer's updated/new Plan.

□ **WO MIS Coding (AT#97-66 Revised, AT#99-27 & AT#00-39)**

There are twelve federally defined work activities, each represented by a three-digit activity code on WO MIS. Local departments may also develop locally defined activities for customers who have received 24 or more months of TCA. These activities can be entered into WO MIS using an **OT*** code with the **third character** being different for each activity. If local departments create locally defined activity codes they must notify the Bureau of Work Program Systems of the OT* code that will be used to track the activities.

Using the Add Activity screen, local departments can enter information regarding the customer's activities. **Local departments should use the OTC activity code immediately upon initiating the conciliation process with a customer.** To enter attendance information on WO MIS, local departments should use the Attendance screen.

At any time during the month, local departments can view information regarding their Time Limited Eligibility cases by running either the TLE Current Report or the TLE History Report from WO MIS Reports Menu #3.

- The **Current Report** provides activity information regarding all TLE customers as of the time the report is run.
- The **History Report** provides information about whether or not TLE customers participated in an activity at any time during the month.

□ **CARES Coding (AT#99-32, AT#99-46, AT#99-48 & CARES Bulletin #01-02)**

CARES Bulletin #01-02 provides a chart of the state-funded TCA groups, CARES screens and fields, work requirements, and the TLE counter. In addition, a comment section is provided to explain how the functions work.

Correct CARES coding is essential for the following state-funded TCA groups: earned income, family violence, adult/child long-term disability and non-parent relative cases because they **are not** subject to either the 24 or 60-month time limits (see attached revised chart). The specific codes entered correctly in the required CARES fields **stop** the time-limited eligibility (TLE) counter from advancing.

In addition, **coding CARES correctly** ensures that state-funded TCA groups can be identified for accurate tracking and state/federal reporting. The action transmittals listed above provide CARES coding procedures for state-funded TCA cases.

Because of the CARES to WO MIS exchange of data, it is important that information shared between the two systems is correct.

NARRATE ALL CASE ACTIVITY CAREFULLY

Local departments must ensure that narration of case activity is clear, concise, and complete according to the action taken by the case manager. Good narration also supports the local department decision in the event of a fair hearing or selection of the case for Quality Control review.

RIGHT TO APPEAL

As a reminder, local departments shall advise households of their right to appeal a local department decision and the procedures for requesting a fair hearing. Local departments must also advise households of any legal services that might be available to represent them during a fair hearing. To find out the number of their local Legal Aid office, customers may call Legal Aid's toll-free number, 1.800.999.8904.

INQUIRIES:

Please direct training requests to Rosemary Malone at 410-767-7949, TCA policy questions to Edna McAbier at 410-767-8805, WO MIS questions to Mark Millsbaugh at 410-767-8558 and CARES questions to Lee Wurtzer at 410-238-1293.

c: DHR Executive Staff
FIA Management Staff
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CTF