Field Operations Memo 2003-31
October 27, 2003

To: **Transitional Assistance Office Staff**

From: **Cescia Derderian, Assistant Commissioner for Field Operations**

Re: **TAFDC – Correcting Inconsistent AU/AP Exempt/Nonexempt Information**

Overview

An LOQC review found discrepancies in TAFDC AUs that need to be corrected. The discrepancies occur between an AP's Work Program Exempt/ Nonexempt status and an AU's Exemption Status on the Work Program Requirements window.

This Field Operations Memo gives TAO staff instructions about:

- a report listing the discrepancies;
- how the discrepancies should be adjusted; and
- the impact these adjustments will have on the APs/AUs.

A report listing the approximately 2000 AUs (reviewed by LOQC in July) will be sent electronically to TAOs for processing. AU Managers must review the report to determine what changes, if any, need to be made to the AU/AP Exempt/Nonexempt Status. Each affected AP/AU must be interviewed by the AU Manager to have the changes explained.

The report must be annotated and faxed to Julie Noble at 617-348-5659 by close of business January 5, 2004.

Edits Preventing Inconsistent AU/AP Exempt/ Nonexempt Information

BEACON Increment 2.1.3 (deployed on May 19, 2003) placed edits on the Work Requirement window to prevent inconsistent AU/AP Exempt/ Nonexempt information. The errors appearing on this report were created prior to May 19, 2003.

Once these AUs have been corrected, the edits on the Work Requirement window will prevent discrepancies in AU/AP Exempt/ Nonexempt information.

Discrepancies

The following are the discrepancies that need adjustment:

- AP Work Program Exempt to Nonexempt;
- AP Work Program Nonexempt to Exempt;
- AU Exemption Status Exempt to Nonexempt;
- AU Exemption Status Nonexempt to Exempt; and
- Current AP/AU Status is Correct, but was incorrect in the past.

To determine if the AP is exempt/nonexempt from the Work Program, see 106 CMR 203.400.

To determine if the AU is exempt/nonexempt from Time-Limited benefits and the Reduced Need and Payment Standard, see 106 CMR 203.100.

AU Managers should familiarize themselves with this policy prior to interviewing their recipients.

Reminder: Both parents in a two-parent AU must meet an exempt reason found at 106 CMR 203.100 for the AU to be an Exempt AU.

APs/AUs Going From Nonexempt to Exempt

For an AP/AU listed on the report that is Nonexempt and should be Exempt, the AU Manager must do the following:

- Schedule an interview to explain the changes occurring in the recipient's AU.

- On the AU Exemption tab of the Work Requirements window, change the AU's reason to an appropriate Exempt reason, as necessary, and in the "Change Date" field, enter the date (in the past) that the AU should have had an "Exempt" status.

   Note: Adjustments to the 24-month clock will be done automatically. **No AU Manager action is needed to adjust the clock.**

- Go to the TAFDC tab and ensure the Work Program Required radio button is set to "No."

APs/AUs Going From Nonexempt to Exempt (continued)

- Change the AP's Work Program Required reason to the appropriate exempt reason.

- Delete the 60-day Work Search period so that when the AP later becomes Nonexempt, Work Program required, a new 60-day Work Search period can be entered.

- Go to the Sanction tab and remove any Work Program Sanction-related reasons using "System Error" as the reason.

  Important: AU Managers should determine the Sanction level, the length of time for the sanction and grant reduction that occurred as a result of the sanction to determine money owed to the recipient as a result of the improper sanction. This amount needs to be issued as a "Retro payment for Supplement" on the Related Benefit window.

- Save the changes on the Work Requirements window.

- Go to the Interview Wrap-up window and authorize these changes.
  Note: This request will require TAO Director approval.

If the change in the AU Exemption status results in a retroactive payment amount that is less than six pay periods (3 months) or is less than $1500, the System will automatically issue the payment.

For retroactive payments greater than six pay periods or greater than $1500 a message will appear in the Special Messages Print by Region (DTA001D) of View Direct informing the AU Manager about the amount of the "Q" payment to be issued as a "Retro payment for > 6 Periods" on the Related Benefit window. This payment needs to be authorized on the Interview Wrap-up window.

If the change in the AU Exemption status is as a result of a disability, go to the Disability window to determine if the disability period is current. If not, give the recipient a new Disability Supplement. This will be considered the first disability in a 60-month period.

APs/AUs Going From Exempt to Nonexempt
For an AP/AU listed on the report that is Exempt that should be Nonexempt, the AU Manager must do the following:

- Schedule an interview to explain the changes occurring in the recipient's AU, including the Time-Limited Benefits, the Reduced Payment Standard and the Work Program Requirement.

- On the AU Exemption tab of the Work Requirements window, adjust the AU's reason to an appropriate Nonexempt reason, as necessary, and in the "Change Date" field, enter the current date. This will start the 24-Month Clock.
  Note: No other AU Manager action is needed to adjust the clock.

- Go to the TAFDC tab and change the Work Program Required radio button from "No" to "Yes."

- Change the AP's Work Program Required reason to the appropriate nonexempt reason.

- Enter the *current* day (appointment day) in the "Work Search" field to begin the AP's 60-day Work Search period. The end date will prepopulate.

- Explain that he or she is now Work Program required (see 106 CMR 203.400(A)(1)) and that he or she may work, participate in an education or training activity (if appropriate), do Community Service or a combination which combined total 20 hours per week to meet the requirement.
  Note: In a two-parent AU, *each* nonexempt parent must be present at the interview so the Work Program can be explained to each parent. A parent already meeting the Work Program requirement who has had the requirement explained to him or her does not have to come to the appointment.

- Explain how he or she meets the Work Program requirement including making him or her aware of FEP and Supported Work (see 106 CMR 203.400(A)(2)).

- Inform the grantee(s) that he or she has 60 days from the interview to meet the Work Program requirement.

APs/AUs Going From Exempt to Nonexempt (continued)

- Inform the grantee(s) that if the 60-day period has passed and the grantee(s) is not employed at least 20 hours per week or participating in an education or training activity (if appropriate), he or she must perform Community Service for 20 hours per week or the sanction process will begin. An ESP referral or Community Service referral, as appropriate, must be made at that time.

- Discuss child care availability with the grantee(s).

- Save the changes on the Work Requirements window.

- Go to the Interview Wrap-up window and authorize these changes.

Important: Do not initiate recoupment for these AUs.

APs/AUs with Correct Exempt/ Nonexempt Status Who Had Incorrect Status

Because of a change in AU/AP status since the report was run, some of the AUs may now display the correct exempt/nonexempt status. For an AU/AP listed on this report whose current status is correct, but whose previous status was incorrect, the AU Manager must review these AUs month by month from the start date of the incorrect status to the date of the current (correct) status to determine:

- AU/AP Exempt/Nonexempt status for each month;

- Calculation of correct benefits for each month;

- Subtractions from the 24-month clock, if applicable for each month; and

- Incorrect sanctions for each month, if applicable.

For these AUs, the AU Manager must manually calculate and issue the benefits owed to the recipient and adjust the 24-month clock.

Important: Do not initiate recoupment for these AUs. Do not *add* months to the 24-month clock for these AUs.

Questions

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