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FAX 96-108
FIELD OPERATIONS MEMO 96-34
September 24, 1996

TO: LOCAL OFFICE STAFF

FROM: JOYCE SAMPSON, ASSISTANT COMMISSIONER FOR FIELD OPERATIONS

RE: WORK PROGRAM AND EDP SANCTION CASE REVIEW

Background Some issues have been raised concerning the sanction process for recipients in the Work Program and those who have failed to comply with their EDPs. Some of the issues raised include the sanction process, the accuracy of TEMP site listings, the actual availability of a particular TEMP site and whether good cause was explored with the recipient before imposing a sanction. As a result a review of active cases with an individual sanctioned for Work Program and Employment Development Plan (EDP) failures is to be conducted.

NOTE: LOQC staff will review the closed cases.

Local Office Actions Local office staff will be responsible for reviewing active cases identified on the printout titled List of Active Cat 2 Cases with Sanctioned Clients (Action Reason 27 & 73). The printout includes active cases in which an individual(s) has been sanctioned for failure to comply with the Work Program (Action Reason 27) and failure to comply with the EDP (Action Reason 73). Using the printout as a guide, the worker must review the cases on the printout including:

- a review of case record documents concerning the sanction;
 - completion of the Work Program/EDP Sanction Checklist (see Attachment A);
 - contacting the sanctioned individual, if necessary;
 - completion of appropriate PACES input documents, if applicable; and
 - submission of the completed checklist to Supervisor for review and signoff.
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Case Review Review the documents in the case record that were the basis for the decision to sanction the individual. In reviewing these documents, be sure to check that:

- the individual had been referred to a specific community service site that the worker had verified had an opening available at the time of referral;
- good cause reasons for not participating in the Work Program or ESP had been explored with the recipient;
- the timing of the sanction complied with the policy in 106 CMR 207.200 and Attachment D in Field Operations Memo 95-31; and
- the PACES input documents were accurately completed and key entered.

Note: Contact the individual if there are questions about the sanction process that need to be discussed with the individual.

If the result of the review is that the sanction was properly imposed, workers should complete the Work Program/EDP Sanction Checklist and submit one for each case listed on the printout.

If the result of a review is that the sanction process was not properly followed, go to Sanction Correction Process

**Sanction
Correction
Process**

When a review has been completed and the worker determines that the sanction was not properly imposed, the worker must do the following:

- complete and submit the necessary PACES documents to reinstate the sanctioned individual retroactive to the date of the sanction;
- determine if the sanction process must be started over again.

If No, submit a completed Work Program/EDP Sanction Checklist for each case reviewed to the Supervisor for review and signoff.

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**Sanction
Correction
Process
(cont.)**

If Yes, complete and submit the necessary PACES input documents to start the sanction process again. **Do not submit this action until you have verified that the action to reinstate the individual has been completed on PACES.**

Submit a completed Work Program/EDP Sanction Checklist for each case reviewed to the Supervisor for review and signoff.

**Review
Timeframe**

These reviews must be completed and all Work Program/EDP Sanction Checklists submitted to the Supervisor by 10/11/96.

Local office directors must submit a summary report (Attachment B) for the office to their Regional Directors by 10/16/96.

Reminders

Work closely with the local office Community Service Liaison to ensure that:

- **the office community service list is accurate and up to date;**
- **there is an actually available community service site opening when you refer an individual;**
- **the individual is an appropriate referral taking into consideration such barriers as language, education level, type of work, etc.; and**
- **the site is contacted by the Community Service Liaison to let them know the individual is being referred for a community service site placement.**

Review the policy and procedures concerning sanctions to ensure the process is accurately followed and clarify any questions you have with the Supervisor before imposing a sanction.

Questions

If you have questions about this review, please have your Policy Hotline designee call the Policy Hotline at (617) 348-8478.

Work Program/EDP Sanction Checklist

Case Name _____ Case SSN _____

Sanctioned Individual _____ SSN _____
(if different from case name)

Sanction Action Reason _____ Date of Sanction _____

(1) Was good cause explored before sanction? Yes ___ No ___

If No, why not? _____

(2) Was the TEMP site to which recipient was referred actually available on the date of referral? Yes ___ No ___

If No, was a referral to another actually available site given?

Yes ___ No ___

If No, why not? _____

(3) Results of Review

(A) Sanction remains in effect _____

(B) Sanction removed and no further sanction _____

(C) Sanction removed and sanction process started over again _____

Worker Signature Date Supervisor Signature Date

Work Program/EDP Sanction Summary Report

Local Office

Total Number of Sanctioned Individuals Appearing on Report _____

Total Number of Individuals Sanctioned for Action Reason 27 _____

Total Number of Individuals Sanctioned for Action Reason 73 _____

Action Reason 27 -- Work Program

How Many AR 27 Sanctions Remain in Effect _____

How Many AR 27 Sanctions Removed with No Further Work Sanction _____

How Many AR 27 Sanctions Removed with Work Sanction Process
Initiated Again _____

How Many Individuals had Good Cause Explored Before Sanctioned _____

How Many of the Individuals Sanctioned were Sanctioned for a Mandated
TEMP Site that was NOT Actually Available _____

Action Reason 73 -- EDP

How Many AR 73 Sanctions Remain in Effect _____

How Many AR 73 Sanctions Removed with No Further EDP Sanction _____

How Many AR 73 Sanctions Removed with EDP Sanction Process
Initiated Again _____

How Many Individuals had Good Cause Explored Before Sanctioned _____

How Many of the Individuals Sanctioned were Sanctioned for a Mandated
TEMP Site that was NOT Actually Available _____

Director's Signature

Date