



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

ROY COOPER • Governor

MANDY COHEN, MD, MPH • Secretary

SUSAN OSBORNE • Assistant Secretary for County Operations for
Human Services

January 15, 2021

Dear County Directors of Social Services

Attention: Work First Program Administrators, Managers, and Supervisors

Subject: Work First Cash Assistance Sanctions (Amended)

Priority: Action Needed

I. GENERAL INFORMATION

On April 22, 2020, in response to the COVID-19 public health emergency declaration issued by the Secretary of Health and Human Services, the Division of Social Services 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. This letter is an amendment to the letter issued on April 22, 2020 to provide clarification regarding MRA and appointment sanctions in the Implementation Procedures.

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 revised or updated sanctions related to child support and/or failure to meet work requirements are as follows:

Voluntary Quit
Non-Compliance with Child Support Enforcement
Voluntary Reduced Hours
Failure to sign MRA-A
Failure to sign MRA-B
Refused AUDIT/DAST-10 Assessment
Fleeing Felon
Fleeing to Avoid Prosecution
Drug related conviction
Violating Probation or Parole
Refused to sign DSS-8219/Refused to accept the Referral
Positive Substance Use Test
Failure to attend QPSA Appointment/Substance Use Test
Failure to participate in required Mental Health Treatment

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF SOCIAL SERVICES • ECONOMIC AND FAMILY SERVICES

LOCATION: 820 S. Boylan Avenue, McBryde Building, Raleigh, NC 27603
MAILING ADDRESS: 2420 Mail Service Center, Raleigh, NC 27699-2420
www.ncdhhs.gov • TEL: 919-527-6300 • FAX: 919-334-1265

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

Immunization Noncompliance
Minor Parents School Attendance Non-compliance
School Attendance Non-compliance
Minor Parent Living Arrangement Non-compliance
Failure to participate in required Substance Use Treatment

NOTE: Failure to attend a scheduled appointment/interview is not the same as Failure to sign MRA-A or MRA-B.

- The eligibility rules for new applications in NC FAST for Cash Assistance do not capture existing sanctions for individuals. Sanction 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 there after 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 with suspended sanctions during this period.

III. IMPLEMENTATION INSTRUCTIONS

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.

Submit any questions regarding this information to the Operational Support Team (OST) at dss.policy.questions@dhhs.nc.gov.

Sincerely,



David Locklear, Deputy Director
Economic and Family Services Section

DL/kg

EFS-WF-01-2021