



NC Department of Health and Human Services

# **Work First Time Limits and Extensions Federal Public Health Emergency (PHE) Lifting Continuous Quality Improvement Specialist**

**April 2023**

# AGENDA

- **Review of DCDL Regarding Time Limits**
- **60 - Month Federal Time Limit**
- **24 - Month State Time Limit**
- **60 - Month State Time Limit**
- **Appeals and Hardship Exemptions**

# **Time Limits**

## **Dear County Director Letter Review**

- **NC FAST will post the Cash Assistance Extension Report which will be found on the FAST Help home page.**
- **Case manager must conduct desk reviews using the DSS-5292**
- **Evaluate for good cause and enter any possible exemption evidence**
- **End date extension evidence and issue adequate notice.**
- **Once all adjustments are made the case manager will end date the extension evidence to June 30, 2023**
- **Work First policy section 105 outlines this process in more detail.**
- **DCDL April 12, 2023 – EFS-WF-02-2023**

# Time Limits

## Dear County Director Letter Review

- **NC FAST will automatically close cases due to exhaustion of the time limit**

**\*\*Note: Extension months used during PHE will not count towards hardship extensions if granted through a hardship hearing.**

**Case will terminate effective 6/30/2023**



# Federal 60-Month Time Limit

**Beginning January 1, 1997, Work First families in North Carolina that include an adult became subject to a Federal 60-month lifetime limit on the receipt of assistance under the Temporary Assistance for Needy Families (TANF) Block Grant, which includes Work First Family Assistance.**

**This time limit should be verified by the worker and entered as countable assistance history evidence regarding the transferred months.**

**Note: The PHE does not effect the Federal 60- Month Time Limit.**



# **Work First Federal 60 - Month Time Limit**

## **Question #1:**

**Should the time limits be adjusted from the PHE from March 2020 through May 2023 regardless of compliance?**

## **Answer to Question #1**

**The Federal 60 - month time limit cannot be adjusted. Participants have the right to request a hardship extension hearing.**

# Work First Federal 60 - Month Time Limit

## Question #2

**Will NC FAST automatically terminate cases with exhausted time limits that have the temporary suspension of time limit terminations due to COVID 19?**

## Answer to Question #2:

**Case managers will need to end date the extension evidence and apply changes and accept decisions. Once the decision is accepted the system batch will auto close the case.**

# **Work First Federal 60 - Month Time Limit**

## **Question #3:**

**What is the end date of the PHE and the extension evidence?**

## **Answer to #3:**

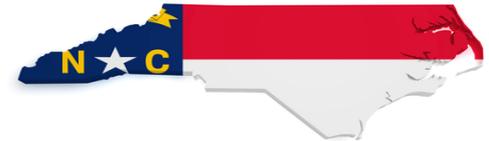
**The end date of the Federal PHE is 5/11/2023 and the end date for extension evidence is 6/30/2023.**

# Work First State 24 - Month Time Limit



# State 24 - Month Time Limit

- **Implemented August 1996**
- **Specific to months received in NC**
- **Applies to most families in North Carolina which includes a work eligible adult and who are participating with Employment Services.**
- **Services received which are not considered assistance do not count on the 24 – month time limit**
- **There are instances where individuals may be included in the payment, and although they are not able to fully participate, are considered work eligible as outlined in WF policy 103.**
- **Services provided to families which are NOT considered assistance do not count towards the State 24- month time limit. (WF 102)**



# State 24 - Month Time Limit Adjustments

- **Work eligible individuals require reasonable accommodations**
- **The public health emergency alone is not a reason for providing an exemption to the 24 - month time limit. Counties should evaluate what supportive services were available to determine if time can be removed.**
- **The 24 – month time limit can have time removed when work eligible individual(s) require reasonable accommodations**
- **Review the training module in the Learning Gateway for more in depth information**
- **Resource: Entering Work First State Exemptions job aid**

# State 24- Month Time Limit

## Question:

**Should the time limit be adjusted from the PHE from March 2020 through May 2023 regardless of compliance?**

## Answer:

**Only the State 24 - month time limit can be adjusted. Counties have some discretion in adjusting a family's State 24 month time limit as previously discussed.**

**If at any time the county departments of social/human services or other community resources are not able to provide needed services, the family time limit should be adjusted.**

**Please note that months in which the family did not engage in employment services when the worker attempted to engage and provide services should be carefully evaluated and documented.**

# State 60 - Month Time Limit

- **The State 60 - Month Time Limit became effective with the implementation of Cash Assistance in NC FAST.**
- **The State 60 - Month Time Limit is a lifetime limit of assistance in North Carolina for the family.**
- **Applies only to months received in North Carolina.**
- **Cumulative lifetime limit of assistance received in North Carolina.**

# State 60 - Month Time Limit

- The Federal 60-Month and State 60-Month time limits are tracked separately and **do not** run simultaneously.
- If an individual is subject to the Federal 60-Month or State 24-Month Time Limit they **are not** subject to the State 60-Month Time Limit.
- Workers should note that if a Work First participant is subject to the Federal 60-Month or State 24-Month Time Limit, they are not subject to the State 60-Month Time Limit.
- It is possible for a household with two parents to have two different time limits tracking.
  - For example, in a household where one parent is included, and a second parent is excluded from the assistance due to not meeting citizenship rules. The parent included in the assistance unit could be subject to the Federal 60-Month Time Limit and/or the State 24-Month Time Limit while the second parent is subject to the State 60-Month Time Limit.
- If a custodial parent previously not included becomes eligible to be included in the assistance unit, the State 60-Month time limit will stop and the Federal 60-Month time limit will begin.
- Refer to WF Policy Section 105 and the training modules in the NC FAST Learning Gateway for more in-depth information.

# Appeals and Hardship Exemptions

# Appeals

- **When a family reaches the end of their Federal 60-month time limit, they may request an appeal if they believe that the limit is in error and that they still have months remaining on their time limit.**
- **Appeals due to errors in the time limit are handled through normal appeal processes as described in policy in the Work First Manual Section 105.**

# Hardship Exemptions

- **A hardship exemption may be granted if a Work First family has experienced circumstances that have made leaving Cash Assistance difficult. These circumstances must be beyond the family's control.**
- **As a reasonable accommodation, individuals with disabilities are entitled to assistance in requesting a hardship exemption. All families should be informed of the rights of individuals with disabilities to receive such assistance.**
- **Hardship exemptions can be granted for a period of time not to exceed six months at a time.**

# Hardship Exemption Hearings

- **Families may request a hardship exemption within the last 3 months, at the end of the Federal 60-month time limit or at any time following termination after the Federal 60-month time limit was reached.**
- **A hardship committee must be designated by the local agency's Board of Social Services.**
- **If hardship is verified, an exemption to the time limit may be granted for any number of months up to 6 months. All exemptions expire after 6 months at which time the family may request another exemption.**
- **Subsequent hardship exemption requests must also be heard by the hardship committee.**

# QUESTIONS?

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