



## North Carolina Department of Health and Human Services Division of Social Services

Economic Independence Section • 325 North Salisbury Street  
2420 Mail Service Center • Raleigh, North Carolina 27699-2420  
Courier # 56-20-25

Michael F. Easley, Governor  
Carmen Hooker Buell, Secretary

Pheon E. Beal, Director  
(919) 733-3055

July 23, 2001

**RE: Work First 24-Month Time Limit**

Dear County Director of Social Services:

**Attention: Work First Supervisors**

Most families who are receiving Work First Family Assistance (WFFA) and Work First Employment Services are subject to a 24-month cumulative limit on the receipt of assistance. Once the 24-month limit has been reached, the family must remain off of WFFA for a period of 36 months before they may reapply. Families may, however, request an extension.

The 24-month time limit was implemented July 1, 1996, and the first month to count on any recipient's time limit was August 1996. The first 24-month time limits expired in July 1998. Therefore, July 2001 represents the 36<sup>th</sup> month following the initial time limit expirations. In August 2001, for the first time, some families may become eligible to apply for WFFA again after being off assistance for 36 months following the expiration of their 24-month time limit.

A question has been raised by a county department regarding one such case. The applicant is asking to apply for WFFA because 36 months have passed since her time limit expired. However, this recipient was granted an extension in 2000, and last received WFFA in January 2001 as part of an extension. The question is whether the 36 month period begins following the original expiration of the limit (July 1998) and runs regardless of any extension or whether the provision of WFFA via an extension requires the 36 month period to restart.

NCGS 108A-27.1 states, in part:

“After having received cash assistance for 24 months, the person or the family may reapply for cash assistance, but not until after 36 months from the last month the person or the family received cash assistance.”

We interpret “the last month the person or the family received cash assistance” to include the receipt of cash assistance as part of an extension. Therefore, when an extension has been granted and has expired, the month following the last month of the extension is the first of the 36 months that a family must wait before reapplying.

**EXAMPLE:** A family exhausts their 24 month limit July 2001 and their WFFA ends. August 2001 is the first month of their 36 months of ineligibility. In November they apply for and receive an extension for November 2001 through April 2002. They again go off of WFFA as of April 31, 2002. In this scenario, May 2002 is the first month of their 36 month period of ineligibility. Receipt of assistance due to the extension causes the 36 month period to start over.

We believe this interpretation is consistent with the policy as stated in the Work First Manual in Section 105A, I., but we will soon issue a change to clarify the interpretation and to include the above example.

Begin immediately using this interpretation when evaluating WFFA applications for families whose time limits have expired.

Sincerely,

A handwritten signature in black ink, appearing to read "Wilbert R. Morris". The signature is written in a cursive style with a large initial "W".

Wilbert R. Morris, Chief  
Economic Independence

cb

cc: Economic Independence  
EI-15-2001