



Transition Guidance for Administering Social Services

After COVID-19 Waivers End



Summary

COVID-19 forced North Carolina to think more creatively about how to administer benefits to our citizens and to ease program operations. To ensure the health and safety of staff in the local county Departments of Social Services and the citizens of North Carolina, numerous waivers and flexibilities were enabled by their relevant federal partners. Based on the waiver, extensions have been made either on a monthly or quarterly basis and are set to run until either the state or federal public health emergency (PHE) ends or the waiver is no longer approved by the federal agency. For the majority of the waivers, the flexibility will end at the end of the month following the month in which the PHE ends. The U.S. Department of Health and Human Services has indicated it will [notify states 60 days prior to termination of the federal PHE](#).

Due to the length of time that these waivers have been in place, many of our customers have become reliant on the flexibilities that the waivers have offered and will need assistance in preparing for their end. In addition to the impact that the end of the waivers will have on our customers, local County Departments of Social Services will also be impacted as the work that was curtailed due to the waivers resumes.

This Guidebook has been developed by DHHS to help plan for the transition back to regular processing after COVID-19 waivers end and is intended to assist counties in developing their individual plans. This document serves as a guide only. Counties are strongly encouraged to develop procedures that will best serve the residents of their county in the most effective manner. This material also contains specific social services program policy guidance.





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Description of the Waivers

Brief description of each FNS COVID-19 waiver.

FNS RECIPIENT COVID-19 RESPONSE WAIVER

- [Emergency Allotment Waiver](#): To ensure that eligible households had access to healthy food during the pandemic, USDA offered states the flexibility to bring all households up to the maximum benefit level for their household size. Starting in March 2020, the Families First Coronavirus Response Act authorized emergency allotments to FNS households. In April of 2021, USDA increased that to ensure that all households received a minimum increase in their benefits of at least \$95.
- [15% increase in FNS Allotments](#): The Consolidated Appropriations Act, 2021, signed on December 27, 2020, increased FNS benefits by raising maximum allotments to 15% of the June 2020 value of the Thrifty Food Plan (TFP). The American Rescue Plan Act extended the 15% increase until September 30, 2021.
- [FNS Online Purchasing](#): FNS rapidly expanded FNS online purchasing to support social distancing covering 90% of FNS households. The FNS online purchasing pilot started prior to the pandemic but expanded quickly to allow FNS recipients and retailers to better abide by local public health orders and allow online grocery ordering for [approved retailers](#). Only eligible foods may be purchased with FNS benefits; delivery fees and other associated charges may not be paid for with FNS benefits. **Online purchasing will be ongoing. For a list of the retailers in NC that accept EBT card payments online, refer to this link: <https://www.fns.usda.gov/snap/snap-online-retailers/North%20Carolina>**
- [Able-bodied Adults without Dependents \(ABAWDs\) Time Limit Suspension](#): FNS issued guidance to states suspending the time limit for ABAWD work requirements during the national emergency. The Families First Coronavirus Response Act suspended the time limit for ABAWDs, except in certain circumstances. If a State offers an ABAWD a slot in a work or workfare program, including a FNS Employment and Training (E&T) program, the individual is still subject to the time-limit. In addition, the State still needs to determine whether the ABAWD who was offered a slot in the work or workfare program had good cause for failure to comply. The suspension of the ABAWD time limit continues for one month following the month in which the federal public health emergency is lifted.
- [Suspended H and I Controlled Substance Felons Assessments during COVID-19 Pandemic](#): USDA allows states to temporarily suspend assessments until the end of the month following the month in which the PHE ends.
- [College Student Eligibility](#): Expands eligibility for certain college students if the individual is eligible to participate in a State or Federally financed work study program during the regular school year, as determined by the institution of higher education or the individual has an expected family contribution (EFC) of \$0 in the current academic year.



FNS ADMINISTRATIVE COVID-19 RESPONSE WAIVERS

- [Application Processing](#): USDA provided flexibilities to support application processing by state agencies given pandemic conditions. USDA began issuing adjustments of application processing procedures in March 2020, using authority granted through the Families First Coronavirus Response Act (FFCRA).
- [Waiver of FNS Interview Requirements](#): USDA allowed states to adjust interview requirements for FNS applicants. FNS regulations (7 CFR 273.2) require an interview prior to benefit issuance. USDA allowed state agencies to adjust:
 - By not requiring a household to complete an interview prior to approval, provided the applicant's identity has been verified and all other mandatory verifications completed. 7 C.F.R. 273.2(a)(2), 273.2(e), and 273.14(b)(3)
 - By not offering a face-to-face interview or granting a request for a face-to-face interview to any household at application or recertification. 7 C.F.R. 273.2(e)(2)(i)
 - By not requiring households that are eligible for expedited service to complete an interview prior to approval, provided that an applicant's identity has been identified and an attempt has been made to contact the household for an interview. March 26, 2020 / Extended in the Continuing Appropriations Act 2021 through June 30, 2021 / Potential extension: Extension of SNAP COVID-19 Administrative Flexibilities May 2021 and Beyond.
- [Extended Certification Periods](#): Under authority provided in the Families First Coronavirus Response Act, allows states to extend certification periods and temporarily waive periodic report form submissions for households whose certification periods expire within a set timeframe, waiving 7 CFR 273.10(f)(5).
- [Telephonic Signature](#): USDA allowed states to document in writing in the case file that a client verbally attested to the information provided on the application, instead of requiring an audio recording of the verbal attestation to constitute a valid telephonic signature.
- [Suspend In-Person Application and Verification Submission](#): USDA allowed approved states to suspend in-person collection of applications and verification documents from households.
- [Claims](#): USDA allowed state agencies to suspend FNS regulations at 7 CFR 273.18(d) by allowing flexibility in the time frame for establishing or disposing of new claims. States are also permitted to suspend FNS regulations at 7 CFR 273.18(e)(1) and (e)(5) by not requiring collection of active recoupments of FNS overpayments, delaying collection on newly established overpayments, and not considering any payments delayed due to this suspension to be delinquent.
- [Fair Hearings](#): USDA allowed state agencies flexibility to extend the fair hearings process up to 120 days from receipt of the request for fair hearings that were already in process or for which requests are received. Also, the time frame for sending notices confirming oral withdrawal requests may be extended



up to 30 days from receipt of the request for such requests received during this same timeframe. FNS also encouraged states to use existing flexibility to conduct hearings by alternate means, such as telephone or video conference, when possible, to meet the standard required time frames.

- [Extend Administrative Disqualification Hearings \(ADH\) Timeframes](#): USDA allowed state to suspend all adjudication timeframes associated with Administrative Disqualification hearings.
- [IRS 2021 Child Tax Credit and Advanced Child Tax Credit Payments](#): Early payments from the Internal Revenue Service (IRS) of 50 percent of the estimated amount of the Child Tax Credit that a taxpayer may claim on a 2021 tax return during the 2022 tax filing season. In some cases, these monthly payments will be made beginning July 15, 2021, and through December 2021.
- [Suspend Treasury Offset Program Temporarily \(COVID-19\)](#): This waiver suspended collection of program integrity claims, recoupments, and forgive delinquent payments by not considering households that miss a claim payment delinquent.

TRANSITION GUIDANCE FOR ACTIVE WAIVERS

Waiver	Special Exit Strategies	Policy Sections	Strategies to Assist Individuals and Families After Waivers End
Emergency Allotment (EA) Waiver	<p>As long as monthly EA Waiver extension requests are approved, Emergency Allotments will end at the end of the last day of the month following the month in which the Federal or State Public Health Emergency (PHE) ends, whichever is earlier.</p> <p>The State will notify counties as soon as it is known that the waivers are ending.</p>	<p>N/A</p>	<p>To help address food insecurity when the emergency allotment waiver ends:</p> <ul style="list-style-type: none"> • Provide information to households about other North Carolina food and nutrition resource programs they may be eligible for (such as WIC, Commodity Supplemental Food Program, TEFAP) • Provide information to households about local Food Banks, Helping Agencies, etc. • Provide dates and time of food drives and additional programs that may be able to provide assistance • Contact the Food Banks and the Helping Agencies to inform them of the waivers ending and that they may have an increase in referrals.





			<p>Once we know the end date of maximum allotments, the State will notify counties as well as use available methods to notify impacted households. If they are able, counties are also encouraged to provide outreach to households who will see a decrease in their food and nutrition benefits when the maximum allotments end. The report in FAST Help (titled FNS Max Allotments With Benefit Breakdown) lists households that will be impacted by the ending of the maximum allotments. This report will be updated once the State knows that Max Allotments are coming to an end so that it can be used by counties to support outreach efforts.</p> <p>Counties are encouraged to inform FNS households at every opportunity that this is a temporary situation and should not be expected to continue on a permanent basis.</p> <p>For seniors in your caseload that may be impacted, consider reaching out to your Area Agencies on Aging to connect them to resources. Area Agencies on Aging are offices established through the Older Americans Act that facilitate and support programs addressing the needs of older adults in a defined geographic region and support investment in their talents and interests. In North Carolina, AAAs are located within regional Councils of Government.</p> <p>Link to more information on Area Agencies on Aging: https://www.ncdhhs.gov/divisions/aging-and-adult-services/adult-day-services/daas-area-agencies-aging</p>
<p>Able-Bodied Adults Without Dependents (ABAWD) Time Limit Suspension</p>	<p>At this time, the ABAWD time limit suspension is effective through the last day of the month following the month in</p>	<p>FNS 260 Able-Bodied Adults without Dependents</p>	<p>Make sure the client is aware they still may be eligible for FNS benefits by meeting the work requirements (i.e., working 20 hours/week, paid or unpaid,</p>

	<p>which the Public Health Emergency (PHE) is lifted. NC FAST will automatically adjust any countable months based on evidence entered by the worker.</p> <p><i>*Additional training material is being developed to further assist counties. If any changes are made to any of the above procedures, counties will be notified and changes will be incorporated in all training material.</i></p>		<p>or by volunteering at a non-profit organization).</p> <p>For information about volunteer opportunities in your area, contact the United Way at 2-1-1 or https://www.unitedway.org/our-impact/featured-programs/2-1-1</p> <p>For Counties that offer the voluntary FNS Employment and Training (E&T) Program, ensure that clients are aware of the program. E&T Counties are the counties that have executed a contract with the North Carolina Division of Social Services (DSS). The E&T Program helps FNS participants gain skills and find work that helps them gain self-sufficiency.</p>
<p>Suspended H and I Controlled Substance Felons Assessments during COVID-19 Pandemic</p>	<p>At this time, the Suspended H and I Controlled Substance Felons Assessments are effective through the last day of the month following the month in which the Public Health Emergency (PHE) is lifted.</p> <p>Once the PHE is lifted, normal policy will be followed beginning with the applicable household's next recertification that is due at least one month (or more) after the month in which the PHE ended.</p>	<p>FNS 270 Controlled Substance Felons</p>	<p>Ensure that the client will have time to complete the assessment before they are determined ineligible to receive FNS benefits.</p>



<p><u>College Student Eligibility</u></p>	<p><i>At this time, the College Student Eligibility Waiver is effective through the last day of the month following the month in which the Public Health Emergency (PHE) is lifted.</i></p> <p><i>Once the waiver ends, begin applying normal policy as follows:</i></p> <p><i>For initial applications, begin applying normal policy 30 days after the PHE waiver ends.</i></p> <p><i>For ongoing households, begin applying normal policy at the households next recertification that is at least 30 days after the PHE waiver ends.</i></p> <p><i>*Additional training material (to be provided) will explain this further and will include examples.</i></p>	<p><u>FNS 235 Student of Higher Education</u></p>	<p><i>Begin reaching out to colleges, universities, and other institutions of higher education in your area to let them know that this waiver is temporary and will be coming to an end in the future (date to be determined). Share alternative food and nutrition resource programs with these partners that they can share with their student population.</i></p> <p><i>Ensure that students are aware that they can use donated meals from their school or the schools' pantry if applicable. The food bank, library, school, or social services office can help them connect with organizations in their community. To find local food banks, contact 1-800-771-2303 or refer to the link: https://www.feedingamerica.org/find-your-local-foodbank</i></p>
<p><u>Waiver of FNS Interview Requirements</u></p>	<p><i>This waiver is currently expected to end September 30, 2022. Unless additional flexibilities are granted, interview requirements will resume on, October 1, 2022.</i></p>	<p><u>FNS 415 Interviewing</u></p>	



<p><u>Extended Certification Periods</u></p>	<p><i>The State is continuing to request extensions for this waiver and the latest approval is through September 30, 2022.</i></p> <p><i>Unless further guidance is received from USDA, recertification requirements as outlined in policy will resume for all cases.</i></p> <p><i>Only applications with a certification period ending July 31st, August 31st, or September 30th and have not been auto extended before will have one 6 month extension of their certification period. As a reminder, any FNS cases that had a six-month certification period already auto extended in the past, cannot be auto extended again.</i></p>	<p><u>FNS 500 SR Category & Reporting Requirements</u> <u>FNS 505 SR Recertifications Requirements</u> <u>FNS 510 SR Recertifications Procedures</u> <u>FNS 515 SR Changes During the Certification Period</u></p>	
<p><u>Telephonic Signature</u></p>	<p><i>This waiver is currently expected to end September 30, 2022.</i></p> <p><i>Unless additional flexibilities are granted, telephonic signature will not be allowed beyond September 30, 2022.</i></p> <p><i>North Carolina is working to build telephonic signature capability in NC FAST using SNAP ARPA funding, but timeline for implementation has not yet been determined.</i></p>	<p><u>FNS 405 Applicant Responsibilities</u> <u>FNS 505 SR Recertifications Requirements</u></p>	<p><i>Encourage the client to sign application and recertification forms before submitting. Failure to provide signature could cause a delay in benefits or denied benefits.</i></p>



<p><u>Suspend In-Person Application and Verification Submission</u></p>	<p><i>This waiver is currently expected to end September 30, 2022.</i></p> <p><i>Unless additional flexibilities are granted, interview requirements will resume on October 1, 2022.</i></p>	<p><u>FNS 200 Eligibility Requirements Overview</u> <u>FNS 400 How to Apply for Food and Nutrition Services</u> <u>FNS 405 Applicant Responsibilities</u> <u>FNS 410 County Responsibilities</u> <u>FNS 415 Interviewing</u> <u>FNS 420 Normal Application Processing</u> <u>FNS 425 Expedited Services Processing</u> <u>FNS 430 Changes Prior to Disposition</u> <u>FNS 435 Determining Eligibility</u> <u>FNS 440 Application Disposition</u> <u>FNS 450 Social Security Administration Application</u> <u>FNS 500 SR Category & Reporting Requirements</u> <u>FNS 510 SR Recertifications Procedures</u> <u>FNS 515 SR Changes During the Certification Period</u></p>	<p>Ensure that the clients are aware they can submit FNS application through ePASS, and mail, fax, drop-off applications, recertifications and verifications.</p>
<p><u>Claims</u></p>	<p><i>This waiver is currently expected to end September 30, 2022.</i></p>	<p><u>FNS 800 Claims</u> <u>FNS 805 Requirements for Establishing Recipient Claims</u></p>	<p>Make certain clients are aware of the repayment methods and agreement of repayment.</p>



	<i>Unless additional flexibilities are granted, Program Integrity Claims are effective after September 30, 2022.</i>	<u>FNS 845 Treasury Offset Program (TOP)</u> <u>FNS 850 NC Debt Setoff Collection (DOR) Procedures</u>	
<u>Fair Hearings</u>	<i>This waiver is currently expected to end September 30, 2022.</i> <i>Unless additional guidance is received from USDA, Fair Hearing procedures as outlined in policy will resume October 1, 2022.</i>	<u>FNS 705 Hearings</u> <u>FNS 710 Administrative Disqualification Hearings</u>	<i>Ensure the client is aware they have the option of telephonic hearings.</i>
<u>Extend Administrative Disqualification Hearings (ADH) Timeframes</u>	<i>This waiver is currently expected to end September 30, 2022.</i> <i>Unless additional guidance is received from USDA, ADH procedures as outlined in policy will resume as of October 1, 2022.</i>	<u>FNS 705 Hearings</u> <u>FNS 710 Administrative Disqualification Hearings</u>	<i>Make certain clients are aware of the timely action and procedures for ADH.</i>



WORK FIRST

Work First COVID-19 Suspended Sanctions Expiring **the Month After the End of the Public Health Emergency**

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

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

Suspension of Program Integrity Claims

Work First COVID-19 Temporary Suspension of Terminations Expiring **the Month After the End of the Public Health Emergency**

24-month state time limit reached

60-month state time limit reached

60-month federal time limit reached



Suspended Sanction	Special Exit Strategies (If the household complies the sanction must be removed)	Policy Section	Strategies to assist families
Voluntary Quit	At the end of the sanction period, the individual must meet all requirements to regain eligibility as outlined in policy.	118 Work Requirements and Services	Ensure the participant is registered with NC Works.
Noncompliance With Child Support Enforcement	The Case Manager must review the IV-D Non-coop list to ensure the Child Support referral was issued and take necessary action. If the head-of-household (HOH) complied with child support prior to the end of the PHE no sanction will be imposed. If the HOH did not comply with child support before the end of the PHE, the case manager must impose the sanction. At the end of the sanction period, the individual must comply with child support to regain eligibility as outlined in policy.	103 Personal Responsibility 116 Child Support Services	Ensure that clients understand that failure to cooperate with child support will make the entire family ineligible to receive Work First Family Assistance payments.
Voluntary Reduce Hours	At the end of the sanction period, the individual must meet all requirements to regain eligibility as outlined in policy.	118 Work Requirements and Services	Ensure the participant is registered with NC Works.
Failure to sign MRA-A Failure to sign MRA-B	<i>The case manager must send an 8146 for an appointment to sign the MRA-A and/or the MRA-B. If the case head does not respond the case manager must impose the sanction, then terminate the case, for failure to keep a scheduled appointment.</i>	103 Personal Responsibility	Ensure the family understands that signing the MRA, including updates and revisions is an eligibility requirement for Work First. A family is not eligible for Work First cash assistance unless the caretaker(s) signs the MRA. Telephonic signatures are acceptable.



			Appointments can be completed telephonically.
Refused AUDIT/DAST-10 Assessment	<i>The case manager must send an 8146 for an appointment to complete the AUDIT/DAST-10 Assessment. If the case head does not respond the case manager must impose the sanction, then terminate the case, for failure to keep a scheduled appointment.</i>	<u>104B Substance Use Mental Health Initiative</u>	Ensure that the family understands that refusing to comply with completing the AUDIT/DAST – 10 will result in the individual being ineligible to receive Work First Family Assistance. Appointments can be completed telephonically.
Felon Fleeing to Avoid Prosecution	<i>Case Managers must reassess the case and reduce the family’s need standard by one for each individual felon fleeing to avoid prosecution or terminate the case if there is only one individual on the case.</i>	<u>104A Individual Criminal Violations</u>	Ensure the family understands that a fleeing felon cannot be included in the family’s needs standard.
Drug related conviction	<i>Case Managers must reassess the case according to H or I controlled substance use felony conviction policy guidelines.</i>	<u>104B Substance Use Mental Health Initiative</u>	Ensure the family understands that an individual convicted of a Class H or I controlled substance felony in North Carolina may be <u>eligible</u> for Work First under the following conditions. 1. The individual may be eligible six (6) months after release from custody or if the individual was never committed to custody, six months after the date of conviction, if there has been no additional controlled substance felony conviction, and 2. The individual has successfully completed



			or has continuously participated in a required substance abuse treatment program determined appropriate by the area mental health authority.
Violating Probation or Parole	Case Managers must reassess the case and reduce the family's need standard by one for each individual in violation of probation or parole or terminate the case if there is only one individual on the case.	104A Individual Criminal Violations	Ensure the family understands that an individual who has violated a condition of probation or parole under federal or State law as determined by a court cannot be included in the family's needs standard. Once the individual has satisfied the conditions of his probation or parole, his needs can be included in the need standard for the family.
Refused to accept the Referral Positive Substance Use Test Failure to attend QPSA Appointment/Substance Use Test	<i>The case manager must send an 8146 for an appointment. If the case head does not respond the case manager must impose the sanction, then terminate the case, for failure to keep a scheduled appointment. If the case head does respond and scores 3 or above, the case manager must follow WF Policy 104B: Substance Use/Mental Health Initiative.</i>	104B Substance Use Mental Health Initiative	Ensure the family understands that failure to comply with substance use testing and appropriate follow up as outlined in policy will cause the individual(s) to be excluded from the family's need standard. Appointments can be completed telephonically.
Failure to participate in required Mental Health Treatment	<i>The case manager must send an 8146 for an appointment to create an MRA-B outlining the participant's requirements to attend mental health treatment. If the case head does not respond the case manager must impose the sanction,</i>	104B Substance Use Mental Health Initiative	Ensure that the family understand that as outlined in policy, failure to participate in required mental health treatment will cause the individual(s) to be



	<i>then terminate the case, for failure to keep a scheduled appointment.</i>		<p>excluded from the family's need standard.</p> <p>Appointments can be completed telephonically.</p>
Immunization Noncompliance	<i>The Case Manager must contact the recipient to obtain up-to-date immunization records for all children in the case. If the participant refuses, the case must be terminated.</i>	103 Personal Responsibility	<p>Ensure the family understands that when a family fails, without good cause, to comply with the terms and conditions of their MRA, including immunization compliance will result in a penalty applied to their Work First case.</p> <p>Appointments can be completed telephonically.</p>
Minor Parents School Attendance	<p>The Case Manager must:</p> <ol style="list-style-type: none"> 1. Contact the recipient to review the MRA-A requirement to provide verification of school attendance. 2. Send the recipient a DSS-8146 requesting verification of school attendance. 3. Terminate the case if the recipient fails to comply. 	103 Personal Responsibility 107 Minor Parent Rules	<p>Ensure the family understands that when a family fails, without good cause, to comply with the terms and conditions of their MRA, including school attendance, penalty is applied to their Work First case.</p> <p>Appointments can be completed telephonically.</p>
Non-compliance School Attendance	<i>The case manager must send an 8146 for an appointment to create an MRA-B outlining the participant's requirements to provide verification of school attendance. If the case head does not respond the case manager must impose the sanction, then terminate the case, for failure to keep a scheduled appointment.</i>	103 Personal Responsibility	<p>Ensure the family understands that when a family fails, without good cause, to comply with the terms and conditions of their MRA, including school attendance will result in a penalty applied to their Work First case.</p>



			Appointments can be completed telephonically.
Non-compliance Minor Parent Living Arrangement	<p>The Case Manager must:</p> <ol style="list-style-type: none"> 1. Contact the recipient to review the minor parent living arrangement policy. 2. Send the recipient a DSS-8146 requesting verification of living with. 3. Terminate the case if the recipient fails to comply. 	103 Personal Responsibility 107 Minor Parent Rules	Refer the family to community support for housing assistance, if needed. Appointments can be completed telephonically.
Non-compliance Failure to participate in required Substance Use Treatment	<p>The case manager must send an 8146 for an appointment to create an MRA-B outlining the participant's requirements to attend substance use treatment. If the case head does not respond the case manager must impose the sanction, then terminate the case, for failure to keep a scheduled appointment</p>	104B Substance Use Mental Health Initiative	<p>Ensure the family understands that Work First applicant/recipients may be sanctioned and/or disqualified for a several reasons related to non-compliance with the substance use screening and testing requirement. Sanctions and disqualifications for non-compliance with substance use screening and testing follow the applicant/recipient even if they move out of the household or the county.</p> <p>Appointments can be completed telephonically.</p>
Suspension of Program Integrity (PI) Claims	Case Managers must coordinate with their county PI worker to ensure PI claims suspended during the public health emergency.	207 Fraud and Intentional Program Violations	Case Manager must notify the recipient of the PI claim.



<p>Timeclocks 24-Month State 60-Month State 60-Month Federal</p>	<p>Case Managers must terminate all cases that exhausted timeclock limits during the public health emergency. Participants must be notified of the impending case closure by <i>the first day of the month the public health emergency will end.</i></p>	<p><u>105 Federal and State Time Limits</u></p>	<p>Ensure the family receives a timely notice of the pending closure by <i>the first day of the month the public health emergency will end.</i> Case Manager should refer the recipient to all supportive services. Ensure the participant is registered with NC Works.</p>
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Thought for Work First Staff to consider as we transition:

1. Communication will be essential to ensuring participants long-term success. Share information readily and often.
2. Begin working with your local Workforce entities to identify in demand jobs in your area.
3. Re-engage community-based organizations informing them of upcoming changes, establishing work sites and countable components for participants.
4. Start conversations with county Child Welfare staff to ensure we are working together to combat barriers and provide supportive services to families.
5. Explore transitional supports and non-recurring short-term services your county can provide.



STATE REFUGEE OFFICE

State Refugee Office COVID-19 Waivers Expire 9/30/2022

Waiver	Special Exit Strategies	Policy Sections	Strategies to assist families
<i>Eligibility Determinations for ORR Benefits and Services</i>	<p><i>Section 400.43 of 45 CFR and ORR PL 16-01 require states to ask the applicant for a written declaration of immigration status and to review documentation of immigration status or category in making an eligibility determination. Due to COVID-19, upon request, ORR will waive these requirements.</i></p> <p><i>Upon expiration of this Waiver, eligibility determination will return to process outlined in Policy Manual.</i></p>	<p><i>Chapter 2; Section II</i></p> <p><i>Chapter 3; Section II</i></p> <p><i>Chapter 4; Section II</i></p>	<p><i>Ensure families are made aware of return to the standard procedures for eligibility determination. Ensuring that they are aware this could impact new applications.</i></p>
<i>Refugee Cash Assistance and Conditions for Receipt of RCA</i>	<p><i>ORR will waive 45 CFR § 400.59 and § 400.66 regarding income eligibility for RCA.</i></p> <p><i>ORR will waive 45 CFR § 400.51(a) and § 400.53(a) that require states to determine an individual is ineligible for Temporary Assistance for Needy Families (TANF) prior to providing RCA.</i></p> <p><i>Upon expiration of this Waiver, eligibility determination will return to process outlined in Policy Manual.</i></p>	<p><i>Chapter 3; Section II. G and I.</i></p>	<p><i>Ensure families are made aware of return to the standard procedures for eligibility determination. Ensuring that they are aware this could impact new applications.</i></p>
<i>Refugee Medical Assistance Eligibility Determinations</i>	<p><i>ORR will waive 45 CFR § 400.94 and § 400.100(a)(1) that require states to determine that an individual is ineligible for Medicaid and Children’s Health Insurance Program (CHIP) before providing RMA.</i></p> <p><i>ORR will allow states to enroll clients into RMA where an agency can document that</i></p>	<p><i>Chapter 2; Section II.</i></p>	<p><i>Ensure families are made aware of return to the standard procedures for eligibility determination. Ensuring that they are aware this could</i></p>



	<p><i>a client's enrollment has been impacted by the pandemic.</i></p> <p><i>Upon expiration of this Waiver, eligibility determination will return to process outlined in Policy Manual.</i></p>		<p><i>impact new applications.</i></p>
<p><i>Refugee Medical Screenings</i></p>	<p><i>To protect public health, states should continue to coordinate refugee medical screenings as local circumstances allow, prioritizing newly arrived refugees with medical needs, while balancing feasibility and safety. ORR encourages states to consider creative solutions to meet the goals of medical screening, including using telehealth resources and online health education.</i></p> <p><i>ORR will waive the 90-day requirement of 45 CFR § 400.107 to allow the provision of medical screening without prior determination of eligibility for Medicaid, CHIP, or RMA beyond the first 90 days after a refugee's initial date of entry.</i></p> <p><i>Upon expiration of this Waiver, agencies will return to standard process</i></p>	<p><i>Chapter 1; Section III</i></p>	<p><i>Assure families that we will continue to coordinate refugee medical screenings while balancing feasibility and safety.</i></p>





<p><i>Vaccinations</i></p>	<p><i>ORR State Letter 99-17, RMA may pay for vaccinations during the refugee’s first year in the United States, as long as the refugee’s medical screening is completed within the refugee’s first 8 months in the United States.</i></p> <p><i>ORR will waive relevant elements of State Letter 99-17 to allow RMA funds to provide vaccinations for ORR-eligible clients who became eligible for benefits, including medical screening services, on or after April 1, 2019, with the additional months after their 1-year mark not extending beyond September 30, 2022.</i></p> <p><i>Upon expiration of this Waiver, agencies will return to standard process</i></p>	<p><i>n/a</i></p>	<p><i>Advise families that following the expiration of the waiver, the cost of vaccinations will not be covered through RMA.</i></p>
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CHILD SUPPORT SERVICES

The following waivers are in place for child support services.

Waiver	Special Exit Strategies	Policy Sections	Strategies for Counties to Consider
<p>Payment Distribution 45 CFR 302.32(b)(1), (2)(i) and (ii)</p>	<p>Requesting a waiver to extend the timeframe for distributing child support payments to 5 business days for fully electronic processes and 10 business days if manual processes are required. Also requesting an extension of 6-months if payments are received from the IRS/BFS or 20 business days from the date federal guidance is received regarding stimulus payments.</p> <p>Upon expiration of this waiver timeframes will revert to federal rules.</p>	<p>Chapter B, Topic 08, Section E</p>	<p>Counties will need to ensure that they are now meeting those timeframes.</p>
<p>Establishment of paternity and support 45 CFR 303.4(d)</p>	<p>Requesting a waiver to extend the timeframe for the establishment of order or completion of service to 300 calendar days.</p> <p>Upon expiration of this waiver timeframes will revert to federal rules.</p>	<p>Chapter B, Topic 08, Section D</p> <p>Chapter I, Topic 02, Section C</p>	<p>Counties will need to ensure that they are now meeting those timeframes.</p> <p>Counties should utilize the self-assessment establishment report in Client Services Data Warehouse (CSDW) to identify cases that need establishment actions by reviewing cases on the report showing N/A and ensuring the next appropriate action has been taken and the timeframe is being met.</p>



			<p>Additionally, review the cases that have failed and identify measures that may need to be implemented to ensure timeframes are met.</p> <p>Counties may also want to work with their judicial partners on methods to improve the court process, ability to increase court time and/or utilize modern hearing capabilities such as virtual hearings.</p>
<p>Enforcement of court ordered obligations 303.6(c)(2)</p>	<p>Requesting a waiver to extend the timeframe for the enforcement of a court order to 180 calendar days if service of process is not needed to take an action and 300 calendar days if service of process is needed.</p> <p>Upon expiration of this waiver timeframes will revert to federal rules.</p>	<p>Chapter B, Topic 08, Section F</p> <p>Chapter P, Topic 02, Section B</p>	<p>Counties will need to ensure that they are now meeting those timeframes.</p> <p>Counties should utilize the self-assessment enforcement report in Client Services Data Warehouse (CSDW) to identify cases that need enforcement actions by reviewing cases on the report showing N/A and ensuring the next appropriate action has been taken and the timeframe is being met.</p> <p>Additionally, review the cases that have failed and identify measures that may need to be implemented to ensure timeframes are met.</p>
<p>Intergovernmental cases 303.7(c)(4)(i),(ii) 303.7(d)(2)(i), (ii), and (iii) 303.7(d)(3) 303.7(d)(4) 303.7(d)(5)(i)</p>	<p>Requesting a waiver to extend the timeframe on specified actions in intergovernmental cases to 40 calendar days to make a referral, 150 calendar days</p>	<p>Chapter R, Topic 04, Section E</p> <p>Chapter R, Topic 05, Section C</p>	<p>Counties will need to ensure that they are now meeting those timeframes.</p> <p>Counties should be diligent in working the various</p>



<p>303.7(d)(5)(ii) 303.7(d)(9)</p>	<p>to take an action, 20 working days to notify the other state of new location, 20 working days to forward documents to the other state, 300 calendar days to take a court action, 60 calendar days to notify jurisdiction of a controlling order determination, and 20 working days to close a case upon request from another state.</p> <p>Upon expiration of this waiver timeframes will revert to federal rules.</p>	<p>Chapter R, Topic 06, Section C</p> <p>Chapter R, Topic 06, Section D</p> <p>Chapter R, Topic 06, Section E</p> <p>Chapter R, Topic 07, Section C</p> <p>Chapter R, Topic 07, Section F</p> <p>Chapter R, Topic 07, Section G</p>	<p>worklist items directly related to the intergovernmental process to ensure federal timeframes are met.</p>
<p>Review and Adjustment 303.8(b)(7)(ii)</p>	<p>Requesting a waiver to extend the timeframe for notifying an incarcerated individual of their right to request a review of their court order to 30 business days.</p> <p>Upon expiration of this waiver timeframes will revert to federal rules.</p>	<p>Chapter L, Topic 02, Section B</p>	<p>Counties will need to ensure that they are now meeting those timeframes.</p>
<p>Income Withholding 303.100(e)(2), 303.100(e)(3), 454A(g)(1)(A)(i), 466, 453A(g)(1) 307.11(c)(1)(i)</p>	<p>Requesting a waiver to extend the timeframe to issue an income withholding order to 5 business days for fully electronic processes and 10 business days if manual processes are required.</p> <p>Upon expiration of this waiver timeframes will revert to federal rules.</p>	<p>Chapter P, Topic 11, Section H</p>	<p>Counties will need to ensure that they are now meeting those timeframes.</p>
<p>Self-Assessment 308.1(a); 308.1(b)(2)(iv)</p>	<p>Requesting a waiver from submitting an annual</p>		<p>Counties will need to ensure that they are now meeting those timeframes.</p>



	<p>report for FFY 2020 and FFY 2021.</p> <p>Upon expiration of this waiver timeframes will revert to federal rules.</p>		<p>Counties should utilize all of the self-assessment reports available in Client Services Data Warehouse (CSDW) to identify cases that need action in each of the self-assessment areas.</p>
<p>Expedited Process 303.101(b)(2)(i)</p>	<p>Requesting a waiver to extend the timeframes to establish orders for support within 6 months on 75 percent of actions filed to 12 months</p> <p>Requesting a waiver to extend the timeframes to establish an order for support within 12 months of 90 percent of actions filed to 24 months.</p> <p>Upon expiration of this waiver timeframes will revert to federal rules.</p>	<p>Chapter B, Topic 08, Section D</p>	<p>Counties will need to ensure that they are now meeting those timeframes.</p> <p>Counties should utilize the self-assessment expedited 6-month process and expedited 12-month process reports in Client Services Data Warehouse (CSDW) to identify cases that need action by reviewing cases on the reports showing N/A and ensuring the next appropriate action has been taken and the timeframe is being met.</p> <p>Additionally, review the cases that have failed and identify measures that may need to be implemented to ensure timeframes are met</p> <p>Counties may also want to work with their judicial partners on methods to improve the court process, ability to increase court time and/or utilize modern hearing capabilities such as virtual hearings.</p>
<p>Review and Adjustment 303.8(e)</p>	<p>Requesting a waiver to extend the timeframe for getting an order or determining that the request to adjust an order</p>	<p>Chapter L, Topic 02, Section D</p>	<p>Counties will need to ensure that they are now meeting those timeframes. Counties should utilize self-assessment review and</p>



	<p>is denied within 180 calendar days of receiving a request to review to 360 calendar days.</p> <p>Upon expiration of this waiver timeframes will revert to federal rules.</p>		<p>adjustment report in Client Services Data Warehouse (CSDW) to identify cases that need action by reviewing cases on the report showing N/A and ensuring the next appropriate action has been taken and the timeframe is being met.</p> <p>Additionally, review the cases that have failed and identify measures that may need to be implemented to ensure timeframes are met</p>
<p>Establishment of cases and maintenance of case records 303.2(a)(2)</p>	<p>Requesting a waiver to extend the timeframe for providing an application for IV-D services on the day it is requested or within 5 working days to 10 working days.</p> <p>Upon expiration of this waiver timeframes will revert to federal rules.</p>	<p>Chapter D, Topic 02, Section H</p>	<p>Counties will need to ensure that they are now meeting those timeframes.</p>
<p>Establishment of cases and maintenance of case records 303.2(b)</p>	<p>Requesting a waiver to extend the timeframe for establishing a case record from 20 calendar days of receipt to 30 calendar days.</p> <p>Upon expiration of this waiver timeframes will revert to federal rules.</p>	<p>Chapter D, Topic 02, Section H</p>	<p>Counties will need to ensure that they are now meeting those timeframes.</p>

