



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

ROY COOPER • Governor

KODY H. KINSLEY • Secretary

SUSAN G. OSBORNE • Assistant Secretary for Human Services

April 12, 2023

Dear County Directors of Social Services

Attention: Work First Program Administrators, Managers and Supervisors

Subject: Work First Cash Assistance COVID -19 Federal Public Health Emergency (PHE)
Ends

Priority: Action Needed

I. GENERAL INFORMATION

As of May 11, 2023, the COVID-19 Federal Public Health Emergency declaration will be lifted. Beginning with the benefit month of March 2020 in response to the COVID -19 public health emergency declaration, the Division of Social Services temporarily suspended Work First cash assistance sanctions related to non-cooperation with child support and/or failure to perform work requirements. This letter also addresses time-limit extensions to provide counties instructions to follow due to the emergency declaration being lifted.

II. POLICY PROCEDURES

Although guidance provided in the "Transition Guidance for Adminstrating Social Services After COVID 19 Waivers End" was provided, the guidance for case managers has changed. Please disregard previous instructions and follow the policy listed below:

- NC FAST will generate a report with sanction dates of 1/1/9999 and cases with extension evidence entered for case managers to review.
- Participants have until May 31, 2023, to come into compliance with Work First requirements.
- If participants remain non-compliant the sanction will be effective July 1, 2023.
- All PHE waivers will end June 30, 2023.
- Case managers will utilize the report provided by NC FAST to determine if the participant has come back into compliance and send an appointment notice to the participant if the case remains out of compliance.
- If the participant fails to contact and/or attend the appointment the case will terminate June 30, 2023.

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

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III. IMPLEMENTATION INSTRUCTIONS

NC FAST will provide a report for cases with sanction dates of 1/1/9999 and cases with extension evidence entered. Case managers should review these reports and take the below action:

Sanctions

If the participant has come into compliance with initial reason for sanction, then the case manager will cancel the sanction. A case note should be entered on the income support in NC FAST documenting the reason the sanction was cancelled. The sanction will continue to show in the compliance tab; however, with a “cancelled” status.

If the participant is still out of compliance with the same sanction:

- Case manager will send an Appointment Notice (DSS-8189) outlining the information needed to come back into compliance.
- Participants must provide requested information to regain compliance no later than May 31, 2023.
- If participants fail to provide information by the established deadline, the case manager must impose the sanction effective July 1, 2023.
- Case managers must send an Adequate Notice (DSS-8110) to inform the household of their appeal rights and notify them of the case termination.
- Case managers must follow the “Editing and End Dating Sanctions” job aid found in FAST Help.

****Note:** If participants provide information to regain compliance after the May 31, 2023, deadline, the case manager should determine if good cause exists. Take appropriate action as needed.

If the participant fails to contact or attend the appointment, the case will terminate June 30, 2023.

If the participant has a new and different sanction to impose once the PHE has ended, the case manager will add the sanction with an effective date of July 1, 2023. See “Creating or Disregarding an Active Sanction” job aid in FAST Help.

Substance Use Assessments

Administrative Letter 9-2020 outlines case managers were able to grant good cause for participants who were unable to be seen by the local Qualified Professional in Substance Abuse (QPSA) due to the COVID- 19 pandemic. Case managers must ensure participants are referred to the QPSA at the next recertification as outlined in Work First Policy Section 104 B. Case managers must review the “Active WF Sanctions” report posted in FAST Help and follow the above guidance.

Exhausted Time Limits

Case managers must pull the Cash Assistance Extension Report from the home page in FAST Help. This report will reflect cases with extension evidence entered for the 24 - month State time limit, 60 – month State time limit, and the 60 – month Federal time limit.

Case managers must utilize the Work First Participation Summary (DSS – 5292) when conducting desk reviews of these cases. Work First policy manual section 105, Federal and State Time Limits provides more detailed instruction. All items on the DSS-5292 must be addressed and the county must determine if there are any instances for good cause or times when exemption evidence should be entered to adjust the 24 – month state time limit. If no adjustments are to be made, the case manager will edit the end date for the extension evidence to June 30, 2023. The case manager will apply the changes to the case, review the changed decision and issue an adequate notice.

Participants have the right to request a hardship extension hearing. These hearings will be conducted at the county level.

Resume of Debts and Collection Activity and Delinquency Determination

Resume recoupments and collection activity on all established Work First over payments effective July 1, 2023. Resume normal State Fair Hearing timeframes as outlined in Work First policy.

Automatic Payment Process for Work First Benefit Cases

NC FAST will cease releasing payments after June benefits are released. Case managers must manually release July 2023 benefits for Work First Benefit (WFB) cases only. Child Only payments will continue to be automatically released.

IV. EFFECTIVE DATE

All provisions implemented during the COVID-19 Federal Public Health Emergency will be invalid as of May 12, 2023. Applications received after May 11, 2023, must follow Work First Policy.

If you have any questions, please submit them to the Continuous Quality Improvement (CQI) Team at dss.policy.questions@dhhs.nc.gov.

Sincerely,



Allison W. Smith, Deputy Director
Division of Social Services, Economic and Family Services

AWS/gbw

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