



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

September 2, 2021

Dear County Directors of Social Services

Attention: Work First Program Administrators, Managers, and Supervisors

Subject: Work First Cash Assistance Sanctions

Priority: Effective Upon Receipt

I. GENERAL INFORMATION

The Division of Social Services suspended Work First cash assistance sanctions related to work requirements beginning with the benefit month of March 2020 in response to the COVID-19 public health emergency declaration issued by the Secretary of Health and Human Services. This letter provides clarity and instruction on the implementation of suspended Work First Cash Assistance Sanctions. This letter makes Administrative Letters EFS-WF-AL-5-2020, EFS-WF-AL-10-2020 and Dear County Director Letter EFS-WF-01-2021 obsolete.

II. POLICY PROCEDURES

Applicants and recipients with active Work First sanctions for failure to cooperate with child support and/or failure to meet work requirements are eligible to receive Work First Cash Assistance if all other eligibility requirements are met. 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 on existing cases for the following reasons must be suspended in the North Carolina Families Accessing Services through Technology (NC FAST) system. The **NC FAST sanctions** related to child support and/or failure to meet work requirements are as follows:

- Non-compliance with Child Support Enforcement
- Non-compliance with MRA-B/Outcome Plan
- Non-compliance with Work Requirements
- Refused AUDIT/DAST-10 Assessment
- Fleeing Felon
- Fleeing to Avoid Prosecution
- Violating Probation or Parole
- Drug related conviction
- Positive Substance Use Test
- Failure to participate in required substance abuse treatment
- Failure to attend QPSA Appointment/Substance Use Test
- Failure to participate in required Mental Health Treatment
- School Attendance Non-compliance
- Immunization Non-compliance

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

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Minor Parents School Attendance Non-compliance
Job Quit

Prior to imposing a sanction, case managers should determine if good cause exists for non-compliance of the work requirement.

NOTE: Failure to attend a scheduled appointment/interview is a reason for immediate sanction and termination

- 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 without an existing sanction 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 2020 and each month there after until the COVID-19 public health emergency period ends. Cases terminated prior to the implementation of DCDL EFS-WF-01-2021 do not require administrative reopen.

III. IMPLEMENTATION INSTRUCTIONS

When the COVID-19 public health emergency declaration is lifted, NC FAST will reinstate the remaining sanction period for all cases with suspended sanctions for the specified reasons during the COVID-19 public health emergency period.

Suspended sanctions for new applications must be created and entered in NC FAST by county staff for the appropriate time frame 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. Using the FAST Help report, counties must review and end date the sanctions appropriately.

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

Sincerely,



Carla West, Senior Director for Economic Security
Economic and Family Services Division of Social Services

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