



Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Transitional Assistance
600 Washington Street • Boston, MA 02111

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Secretary

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Commissioner

Field Operations Memo 2003-21
August 29, 2003

To: Transitional Assistance Office Staff

From: Cescia Derderian, Assistant Commissioner for Field Operations

Re: TAFDC – Work Program Requirement Expansion and Revised Extension Requirements

Overview

Effective September 8, 2003, nonexempt grantees whose youngest child is between the ages of two and mandatory full-time school age:

- 1) are now required to meet the Work Program requirement unless they meet a reason found in 106 CMR 203.400(A)(1).
- 2) may meet the Work Program requirement through Department-approved education or training activities in addition to employment or community service.
- 3) if in the final three months of time-limited benefits and currently enrolled and participating in a Department-approved education or training activity, may be granted a three-month extension to complete the activity. A second three-month extension may be granted to complete the activity, if necessary.

Note: Applications taken on or after September 8, 2003 must meet these Work Program requirements.

Purpose of Memo

This memo informs AU Managers:

- about a mailing to this population;
 - about the Work Program changes;
 - how to explain these changes to and process nonexempt grantees impacted by these changes; and
 - about the change to Extensions for nonexempt grantees in education and training programs.
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Regulations

State Letter 1261 transmits changes to the Work Program Policy and Extensions.

See 106 CMR 203.400(A)(1) for *who* must meet the Work Program requirement.

See 106 CMR 203.400(A)(2) for *how* they meet the Work Program requirement.

Meeting the Work Program Through Education or Training: Youngest Child Between Age 2 and 6

In addition to meeting the Work Program requirement through work, community service or another activity listed in 106 CMR 203.400(A)(2) grantees whose youngest child is between the ages of two and mandatory full-time school age may meet the Work Program requirement through a Department-approved vocational educational or training activity. The activity only meets the Work Program requirement for 12 months, unless “grandfathered.” For procedures on who may be grandfathered, see the “Grandfathered Grantees” section later in this memo.

The vocational education or training activities in the following components will be approved when the goal is to improve the grantee’s skills and help him or her get a job. The vocational education or training activities that meet the Work Program requirement are limited to:

- Skills Training;
 - Basic Education (GED, ESL, ABE);
 - Post Secondary Education (2 Year College) as limited on the next page; or
 - YPP.
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**Meeting the
Work Program
Through
Education or
Training:
Youngest Child
Between Age 2
and 6
(continued)**

As approved by the Department, non-degree educational programs at a two-year college will count towards the Work Program requirement if the curriculum is designed to prepare a recipient for a specific type of occupation or vocational proficiency upon completion of the program. This includes the ESP programs offered at Holyoke Community College, Middlesex Community College and Springfield Technical Community College, which provide Skills Training activities outside of an Associate Degree program. These activities only meet the Work Program requirement for 12 months.

Example: Mary Smith wishes to enroll in a Travel Agent program at Bunker Hill Community College. This program, lasting 12 months, will lead to a certificate that Mary can use to find employment. This Post Secondary Education component would be approved by the Department.

Grantees *may* enroll in a two-year Associate Degree program designed to prepare the grantee for a specific occupation upon completion of the program, but the Work Program requirement will only be met for 12 months of the two-year period. Degree programs designed to prepare students for further education will not be approved by the Department.

Example: On December 10, Susan Jones is told by her AU Manager that she is Work Program required. After having the various components explained to her, Susan decides to enroll in a Medical Assistant Associate Degree program for 20 hours a week at Bunker Hill Community College in January 2004. Susan is told once enrolled and regularly attending she meets the Work Program requirement for 12 months.

If the grantee is wait-listed for an education or training activity for more than *four* weeks, he or she must meet the Work Program requirement by participating in work and/or community service for 20 hours per week until the slot becomes available.

If the education or training activity is less than 20 hours per week, he or she must work or participate in community service which combined with the education or training activity will total 20 hours per week.

Only one parent in a two-parent AU may meet the Work Program requirement by participating in an education or training activity. At least one parent in a nonexempt AU must meet the Work Program requirement as specified in 106 CMR 203.400(A)(2).

"Grandfathered" Grantees Grantees enrolled as of September 8, 2003 in an approved ESP activity, including an Associate Degree program, may use the activity to meet the Work Program requirement as a "grandfathered" activity. The "grandfathered" activity is not limited to 12 months. If grantees are participating less than 20 hours per week, they must participate in education or training, community service or work to total 20 hours per week. Once the activity is completed (or their youngest child reaches mandatory full-time school age) these grantees must meet the Work Program requirement as stated in 106 CMR 203.400(A)(2).

Note: Associate Degree programs *must* be completed within three years of enrollment.

Recipient Mailing Attachment A will be sent to those recipients affected by the change, telling them of the change and telling them that an appointment will be scheduled to explain the change. This mailing will occur the week of September 1, 2003.

**AU Manager
Responsibilities**

A listing of the grantees affected by these changes will be made available and electronically sent to TAOs by September 3, 2003.

AU Managers must:

- prioritize scheduling appointments for grantees whose youngest child is between the ages of 2 and full-time school age as follows:
 - 1) Grantees *not* enrolled in an ESP component.
 - 2) Grantees with active EDPs but no related activity (found in the “Active EDPs with no Active Activity” view).
 - 3) Grantees currently enrolled in an education or training program or wait-listed for an education or training program.
 - 4) Grantees currently working.
- schedule appointments for these grantees as soon as possible to explain the Work Program requirement. AU Managers must begin interviewing these grantees *no later than September 15, 2003*.

Note: A full reevaluation should only be done at the TAO Director’s discretion. For all AUs whether a full reevaluation is being completed or not, AU Managers must ensure that certain data impacting error rate is accurate (i.e., household size, shelter expenses, AU Exemption status).

All grantees must be seen and have the Work Program requirement explained to them *no later than November 21, 2003*. TAO Directors should contact their Regional Director if this deadline cannot be met.

Grantees do not start the 60-day work search period until grantees meet with the AU Manager and have the Work Program requirement explained to them.

**AU Manager
Responsibilities
(continued)**

At the interview with these grantee(s), the AU Manager must:

- explain that he or she is now Work Program required (see 106 CMR 203.400(A)(1)) and that he or she may work, do Community Service or participate in an education or training activity or a combination which combined total 20 hours per week to meet the requirement;
Note: In a two-parent AU, *each* nonexempt parent must be present at the interview so the Work Program can be explained to each parent. A parent already meeting the Work Program requirement who has had the requirement explained to him or her does not have to come to the appointment.
 - explain the exemptions from Time-Limited Benefits and the Reduced Need and Payment Standard (see 106 CMR 203.100);
 - explain how he or she meets the Work Program requirement including making him or her aware of education or training activities, FEP and Supported Work (see 106 CMR 203.400(A)(2));
 - explain that if enrolled as of September 8, 2003 in an approved ESP activity he or she may use the activity to meet the Work Program requirement as a "grandfathered" activity. AU Managers must ensure that a BEACON sanction is not imposed on the grantee. (See page 7 for details.);
 - inform the grantee(s) that he or she has 60 days from the interview to meet the Work Program requirement;
 - inform the grantee(s) that if the 60-day period has passed and the grantee(s) is not employed at least 20 hours per week or enrolled in an education or training activity, he or she must perform Community Service or education or training activities or a combination of the two or the sanction process will begin. An ESP referral or Community Service referral, as appropriate, must be made at that time;
Note: The Department has an obligation to find a Community Service site.
 - discuss child care availability with the grantee(s);
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**AU Manager
Responsibilities
(continued)**

- on the Work Requirements window, ensure the AU Exemption tab has the Exemption Status of “Nonexempt” unless an exemption reason applies;
- on the TAFDC tab of the Work Requirements window, click "Yes" on the Work Program Required radio button; and
- in the Required Status Reason drop down box, select either:
 - Youngest Child 6 or Older;
 - Youngest Child 2 to school;
 - Parent in 2 Prt AU-Ed/Tr No;
This is selected for the parent in a two-parent AU whose youngest child is school age or older; or the parent whose youngest child is below school age and cannot use education and training to meet the requirement because the other parent is.
 - Parent in 2 Prt AU-Ed/Tr Yes
This is selected for the parent in a two-parent AU whose youngest child is below school age and using education and training to meet the requirement.
- in the Work Search field enter the date of the interview as the Start Date (the End Date field will automatically prepopulate to 60 days from the Start Date); and
- inform the grantee(s) that a follow-up contact will take place in **45** days to measure the progress the grantee is making to meet the Work Program requirement.

**Preventing a
Sanction**

Until a change to BEACON is made in November 2003, after the grantee is changed to Work Program required on the Work Requirements window, there is a possibility the grantee may be sanctioned at a later time. This will occur when the AU Manager keys into BEACON the number of participation hours for a Work Program required activity (Employment, Pre-Worksite Training, Structured Job Search, Community Service or Welfare to Work) from the participation report or the Monthly Report. If the participation hours in these activities are below 20 hours, the AU Manager needs to give the grantee "good cause" by selecting the reason "Conversion-Good Cause" on the Good Cause tab on the Monitor Participation window to prevent the sanction for failing to meet the Work Program requirement. **AU Managers must be aware of this and ensure this grantee is not sanctioned.**

**Work Program
Activities**

The following chart provides an easy reference to the most common activities for grantees to meet the Work Program. (See 106 CMR 203.400(A)(2) for the complete list of activities a grantee may perform to meet the Work Program requirement.)

Age of Child	Activity: Single Grantee AU	Activity: 2-Parent AU
6 years old or older	<ul style="list-style-type: none"> • Work 20 hours per week; • Community Service 20 hours per week; or • a combination of the two totaling 20 hours per week; or 	<p>Both Parents Nonexempt:</p> <ul style="list-style-type: none"> • Work 20 hours per week; • Community Service 20 hours per week; or • a combination of the two totaling 20 hours per week.
2 to 6 years old	<ul style="list-style-type: none"> • Work 20 hours per week; • Community Service 20 hours per week; • Education or training activity 20 hours per week; or • A combination of any two totaling 20 hours per week. 	<p>One (or Both) Parent Nonexempt:</p> <ul style="list-style-type: none"> • Work 20 hours per week; • Community Service 20 hours per week; or • a combination of the two totaling 20 hours per week. <p>Other Parent Nonexempt:</p> <ul style="list-style-type: none"> • Education or training activity 20 hours per week; or • A combination of education and training and community service or work which combined total 20 hours per week. Or may participate in the activities listed above.
Under 2 years old	No activity required, but may volunteer to participate in one of the activities listed above.	<p>One Parent Nonexempt:</p> <ul style="list-style-type: none"> • Work 20 hours per week; • Community Service 20 hours per week; or • a combination of the two totaling 20 hours per week. <p>Other Parent: No activity required, may volunteer to participate in one of the activities listed above.</p>

**Work Program
Activities
(continued)**

Note: FEP and Supported Work have hourly requirements in excess of the 20-hour per week Work Program requirement and *cannot* be used in combination with any other activity to meet the Work Program requirement.

**Extensions and
Education and
Training
Components**

Nonexempt grantees who are in a current Department-approved education and training program for 20 hours a week who request extensions in the final three months of their 24 months of time-limited benefits may be automatically granted a three-month extension by the TAO Director to complete the activity. A second three-month extension may be granted to complete the activity, if necessary.

Questions

If you have any questions, please have your Hotline designee call the Policy Hotline at 617-348-8478.

{BEACON USER STREET_ADDRESS}
{BEACON USER CITY, STATE, ZIP}

Important Notice - Read Carefully
Este Mensaje Es Importante - Lea Cuidadosamente

Massachusetts Department of Transitional Assistance

{RECIPIENT NAME}
{RECIPIENT ADDRESS}
{RECIPIENT CITY/TOWN, STATE, ZIP}

{RECIPIENT SSN}
{BEACON USER OFFICE NAME}

September 2003

Important Notice Please Read

Dear {Recipient}:

The Department has changed its rule about participating in the Work Program. Parents whose youngest child is between two and school age are now required to participate in the Work Program for 20 hours per week. Our records show that this new rule applies to you.

You can meet the Work Program by:

- Working in a job for pay;
- Working full time in the Full-Employment Program;
- Participating in a community service program; or
- Participating in a Department-approved education or training activity

You will be given 60 days to find work. If at the end of the 60 day period you have not found work, you will be required to do 20 hours of community service at a Department-approved community service site or participate in a Department approved education and training program, or some combination of the two.

Your worker will make an appointment with you soon to talk about this change. Until you meet with your worker, you do not have to meet this requirement.

If you need child care, we will help you to receive it. If child care is not available, you will not have to meet this requirement. Ask your worker about child care availability.