

Department of Social and Health Services

Olympia, Washington

EAZ Manual

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Category	WorkFirst Sanctions-Participation
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Summary

Updates to the WorkFirst Sanctions-Participation due to changes with 2SHB 1603, eliminating the three non-compliance sanction closures as of

WorkFirst Sanctions-Participation

Revised ~~August 31, 2015~~ [July 28, 2019](#)

Purpose:

This section describes the penalties that a TANF recipient will experience if the person fails or refuses to participate, without good cause, in the activities identified on their WorkFirst Individual Responsibility Plan (IRP).

[WAC 388-310-1600 - WorkFirst Sanctions](#)

- [Clarifying Information and Worker Responsibilities](#)

Clarifying Information - [WAC 388-310-1600](#)

1. Mandatory TANF/SFA WorkFirst participants are sanctioned when the person has failed or refused WorkFirst activities without establishing good cause. The WorkFirst Program Specialist or WorkFirst Social Service Specialist determines whether or not there is no good cause ~~exists~~ for not participating in required WorkFirst activities.

NOTE: For further information on WorkFirst sanction process see the [WorkFirst Handbook](#)

2. Review the WorkFirst sanctioned case to see if the Basic Food Benefits should be sanctioned under the Basic Food Program rules for failure or refusal to comply with the Basic Food E&T requirements. This applies only to non-exempt Basic Food recipients.

~~NOTE:~~ **NOTE:** For further information on the BFE&T sanction process see the [Basic Food E/T Section G. - Disqualifications](#)

Worker Responsibilities - [WAC 388-310-1600](#)

Non-Compliance Sanction (NCS)

See the WorkFirst Handbook - Non-Compliance Sanction Policy on how to process the sanction including the eJAS instructions.

1. Determine if the person has refused or failed to participate in WorkFirst activities identified on the IRP without good cause. This determination is made during the good cause and case staffing process.
2. If good cause is not approved, review the case using the NCS case staffing and review criteria tool in eJAS then impose the sanction and sanction penalties. (For the entire process, see the note below).
3. Complete the coding in ACES and eJAS.
4. If the parent receives the sanction case closure penalty or the sanction exceeds two months, see ACES instructions below.
5. If a supervisor or designee agrees with the recommendation for case closure, follow the eJAS and ACES instructions below.

Non-Compliance Sanctions (NCS) Re-Applicants

A person may re-apply for WorkFirst cash assistance (TANF) or State Family Assistance (SFA) after NCS termination at any time by submitting a new application. There are different processing instructions depending when the application is received.

1. Applications received prior to the effective date of NCS termination

Since the case is still open on the current WorkFirst cash assistance (TANF) AU through the end of the month, refer the applicant to WorkFirst staff to follow WFHB 3.6.3.4.

2. Applications received after the effective date of NCS termination

1. Schedule intake interview.
2. Follow the WorkFirst Sanction Reopen (WFSR) procedure (for staff use: See [CSD Procedure Handbook](#)), and refer to WFHB 3.6.3.2 to remove the NCS case closure and reopen the case effective the first of the month when the person:
 1. Closed due to the sanction case closure penalty; and,
 2. Completes a financial intake interview by the end of the month following the paid through date.
3. For non-WFSR applications, refer the applicant to WorkFirst staff to determine whether the person must meet WorkFirst participation requirements before s/he receives cash.

3. Approving applicants whose assistance was terminated under the NCS policy.

Applicants must participate for 28 days before we open the case unless they are a WorkFirst Sanction Reopen (WFSR) case or have a good ~~reason~~ cause to interrupt participation. The WorkFirst Program Specialist or WorkFirst Social Service Specialist will make the participation requirement determination and will communicate the outcome to the application worker. _____A

All NCS reapplications must be referred to a WorkFirst Program Specialist or WorkFirst Social Service Specialist to determine whether the applicant is able to participate, including WorkFirst Sanction Reopen (WFSR) cases.

1. Follow these procedures to process an application:
 1. Give the person a pending letter for financial eligibility if needed and the WorkFirst participation requirement.
 2. Refer the person (with a copy of the pending letter) to the WorkFirst Program Specialist or WorkFirst Social Service Specialist to discuss the WorkFirst participation requirement.
 3. Except for WFSR cases, once the person meets financial eligibility, provide them with an updated pending letter with the following free form text:
"You have met the financial eligibility requirement. You must still meet the WorkFirst participation requirement to regain your WorkFirst cash assistance (TANF)."
 4. Except for WFSR cases, if the application will exceed beyond the 30th day (standard of promptness), then enter a Delay Reason Code of WF (WorkFirst Participation) on the MISC screen in ACES. The SOP Extension Date field on

the MISC screen should be updated with the date the client is expected to complete the participation requirement.

5. Except for WFSR cases, after participation requirements have been met, cash benefits start from the date the person was otherwise financially eligible.
 6. Prior to opening the case, check to see if the person received child support CEAP or other income sources that must be budgeted against the grant. We budget CEAP as countable unearned income for Cash (OA on the UNER screen) for the month they received the benefit.
 7. Follow the procedures for processing a WorkFirst Sanction Reopen Red Application and refer to WFHB 3.6.3.2 ~~for~~ for WFSR cases.
 8. The TANF open effective date cannot be earlier than the NCS termination effective date.
 9. For non-WFSR cases, after participation requirements have been met, cash benefits start from the date the person was otherwise financially eligible.
2. If the WorkFirst Program Specialist or WorkFirst Social Service Specialist determines that participation is not required, they will communicate that information to the intake worker.
 1. Enter the re-qualifying code WP on the ACES WORK screen to remove the 28 day participation requirement.
 2. Update the pending letter for any remaining financial eligibility items still needed or approve the application (if the financial eligibility criteria have been met).
 3. After participation requirements have been met, cash benefits start from the date the person was otherwise financially eligible.
 4. Prior to opening the case, check to see if the person received child support, CEAP or other income sources that must be budgeted against the grant. We budget CEAP as countable unearned income for Cash (OA on the UNER screen) for the month they received the benefit.
 5. The TANF open effective date cannot be earlier than the NCS termination effective date.

4. Denying an NCS application

1. If the intake worker is notified that participation has stopped, then ~~;~~ Deny the application (leave the re-qualifying reason field blank on the WORK screen). Finalize the application and add the following free form text to the denial letter:

"You haven't completed the WorkFirst 4-week participation requirement as described in your IRP. To request reconsideration, contact your WorkFirst Program Specialist or WorkFirst Social Service Specialist."

2. If the client requests reconsideration, then ~~;~~ Instruct the person to contact their WorkFirst Program Specialist or WorkFirst Social

Service Specialist if they want a reconsideration of their denial. If the WorkFirst Program Specialist or WorkFirst Social Service Specialist reports that there has been client contact, follow these steps depending on the information received.

1. Deny the reconsideration if no good ~~cause reason~~ was determined.
2. Re-screen and approve the application (or update the pending letter if other financial eligibility elements are still needed) if no further participation is required.
3. Re-screen the application with SOP code if the reconsideration is granted. The Delay Reason Code field on the MISC screen in ACES should be coded with "WF" (WorkFirst Participation) if the case will exceed the 30 day standard of promptness. The SOP Extension Date field on the MISC screen should be updated with the date the client is expected to complete the participation requirement.

5. Applicants who have three or more prior NCS closures ~~(This section is no longer valid after 7/28/19. Households will not be permanently disqualified from TANF after this date.) Permanent disqualification no longer exist. See the WorkFirst Handbook for further details on processing sanctions.~~

~~5.~~ A person with three or more NCS closures since March 1, 2007 will be permanently disqualified from receiving TANF/SFA. If a person is permanently disqualified, that person's entire household is ineligible to receive TANF/SFA.

1. Applicants for TANF/SFA or DCA who have had three or more NCS case closures will be denied because they are permanently disqualified from receiving TANF/SFA.
2. Before denying the application, follow this procedure to review the case to ensure the three NCS terminations listed on the ACES WORK screen are accurate.
 1. Review the NCS termination dates listed on the ACES WORK screen for accuracy
 2. Go into "B" inquiry for the TANF AU for the month/year following each NCS termination listed
 3. Review the reason code for the termination to ensure the case closed for NCS (252)
 4. Review the narrative to ensure that the NCS wasn't overturned in administrative hearing
 5. Document that the NCS termination dates have been reviewed and confirmed.

NOTE: Permanent TANF Disqualification

See the WorkFirst Handbook—3.6.4 Permanent TANF Disqualification for more information. (No longer valid as of 7/28/19.)

~~**NOTE: Non-Compliance Sanction (NCS)** See the [WorkFirst Handbook - Non-Compliance Sanction Policy](#) on how to process the sanction including eJAS instructions.~~

ACES Procedures

- For ACES processing on NCS cases, see [ACES instructions](#).
- See ~~Disqualified or~~ [Sanctioned Assistance Unit or Client - Canceling a Sanction](#)

E-JAS Procedures

See the [WorkFirst Handbook](#) for information on Sanctions in eJAS.

WorkFirst Sanction Reopen Procedures

See the CSD Procedures Handbook, Processing a WFSR Red Application for information on how to process these cases.