This guide is for use only on NCS tools opened prior to 10/17/2014.

4 Month: Non-Compliance Sanction Case Staffing and Review Criteria Reference Guide

Updated April 2011

The Non-compliance Sanction (NCS) Case Staffing process and automated supports track each specific incidence of non-participation. If you consider sanction based on non-participation, you must create an NCS Case Staffing and Review Criteria, otherwise referred to as the NCS eJAS tool. The tool is a living document which provides the reader with evidence of steps taken when determining non-participation.

This tool is created by the WFPS/SW when initiating the sanction process, and is used as a guide to ensure the sanction policy is followed. The CSO Supervisor/Designee will review and complete sections of the NCS eJAS tool when approving or denying the sanction recommendation, and when approving or denying the recommendation for TANF termination.

This document offers guidance for completing the tool.

Section	CSO WorkFirst Program Specialist/WorkFirst Social Worker
Question	**Document**
1. Was an IRP created? Yes/No	*No* (continue) *Yes* (continue to questions 1a, b, c, d, and e)
*Note: The following question is available if the answer to question #1 is **No***	
a. Enter the date the appointment letter was sent	WFPS/SW should use the eJAS appointment letter when scheduling the person to develop an IRP. Clicking on the hyperlink 'Letter History' will take the user to the client's letter history. The user will select the correct eJAS letter date by clicking the adjoining radial button. This will auto populate the date field on the tool.
*Note: The following group of questions are available only if the answer to question #1 is **Yes***	
a. Did the IRP clearly outline what participation was required? Yes/No	Review the IRP to ensure it includes: • Start and end date for each activity listed on the IRP • Hours for each activity • Any other specific requirements that are tied to the WorkFirst activity *No* (consider whether sanctioning is appropriate) *Yes* (continue)
b. Did the person agree to the IRP? Yes/No	Review eJAS case notes to ensure: • The IRP was created/updated with the parent either in person or via the phone • The person knew and agreed to the IRP requirements *No* (consider whether sanctioning is appropriate) *Yes* (continue)
c. Enter the date the person agreed to the IRP.	This date should match the last date the IRP was created or updated and should be found in the client eJAS notes. Clicking on the hyperlink 'IRP History' will take the user to the client's IRP History. The user will select the correct IRP date by clicking the adjoining radial button. This will auto populate the date field on the tool.
d. Enter the date the person was given or mailed the IRP.	This date should match the last date the IRP was created or

	updated and should be found in the client eJAS notes. Clicking on the hyperlink 'Notes History' will take the user to the client's Notes History. The user will select the correct note date by clicking the adjoining radial button. This will auto populate the date field on the tool
e. Did the person return the signed IRP within 10 days? Yes/No/NA – signed in office.	The IRP does not need to be signed and returned to the CSO for it to be valid. Policy does not require a copy of the signed IRP in DMS. Review the case notes and/or the client's ECR to determine if the IRP was signed in the office. *Yes/No/NA* (continue)
2. Enter the date of the eJAS note documenting what the person failed to do.	WFPS/SW document in eJAS notes: • What the person failed to do • If the person showed or no showed to an appointment, and what date the appt was scheduled • Referral Backs, etc. Clicking on the hyperlink 'Notes History' will take the user to the client's Notes History. The user will select the correct note date by clicking the adjoining radial button. This will auto populate the date field on the tool.
3. Is there any reason to believe the person is not receiving their mail? Yes/No	Review the Client's ECR to determine if there has been any recent mail returned. *No* (skip to question #4) *Yes* (continue with the mandatory text box)
Text box: Describe the steps taken	If mail has been returned, describe the steps taken by the department to ensure the individual received a copy of their letters and IRP.
4. Has there been an opportunity to screen for family violence issues within the last 12 months? Yes/No	All WorkFirst clients must be screened for family violence annually. If an opportunity exists, this needs to be done at or prior to the good cause determination and case staffing. Review the case notes to determine if the FV screening has been completed and when. If it has not been completed and the person did not show up for the good cause case staffing appointment, review the case to determine if the WFPS/SW had an opportunity to conduct the FV screening. If an opportunity existed, but the screening was not conducted, consider not recommending sanction and make appropriate referrals. *No* (skip to question 4a and complete the mandatory text box) *Yes* (continue entering the FV screening date)
Enter FV screening date	Clicking on the hyperlink 'FV Notes' will take the user to the clients list of FV Screenings. The user will select the correct screening date by clicking the adjoining radial button. This will auto populate the date field on the tool.
a. Is family violence a current barrier to participation? Yes/No	Review the case notes to determine if documentation is present and whether it raises concern. Note: If family violence is a barrier, a referral to the social worker, FV worker, or outside agency is required.
Text box: If the screening was not completed, briefly describe the attempts made.	This is a mandatory text box if the answer to #4 is "No". If the screening was not completed describe the attempts made and/or reasons why there was no opportunity to screen.
5. Is a member of this household pregnant? Yes/No	Review the adult member's status in ACES and eJAS for this cash assistance unit. *No* (skip to question #6) *Yes* (continue)

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a. Was a Full P to E assessment completed for the parent? Yes/No	Review eJAS assessment history notes. *No* (continue to question 5b) *Yes* (enter the assessment date)
Enter the assessment date	Clicking on the hyper link 'Assessment History' will take the user to the clients list of assessments. The user will select the correct assessment date by clicking the adjoining radial button. This will auto populate the date field on the tool
b. If no, enter the date of the appointment.	Review eJAS letter history or IRP for the verification the person was invited to a P to E assessment. Clicking on the appropriate hyperlink will take the user to the client's eJAS 'Letter History', ACES 'Letter History', or the 'IRP History'. The user will select the appropriate letter or IRP which reflects the scheduled appointment by clicking the adjoining radial button. This will auto populate the date field on the tool and bold the selection.
c. If this parent is in their 3rd trimester, are they required to participate in mandatory activities? Yes/No	Review the P to E assessment. *No* (If the individual is in their 3rd trimester but does not have any chemical or mental health barriers, do not proceed with sanction. *Yes* (continue)
Text box: Comments are optional	WFPS/SW may wish to enter comments of scheduled appointment, missed appointments, assessment findings, etc.
6. Is there a child under one year old in the household? Yes/No	Review ACES or eJAS for household member's ages.
a. Was an assessment completed for this parent? Yes/No	Review eJAS assessment history notes. *No* (continue to question 6c) *Yes* (continue)
Enter the assessment date	Clicking on the hyper link 'Assessment History' will take the user to the clients list of assessments. The user will select the correct assessment date by clicking the adjoining radial button. This will auto populate the date field on the tool.
b. Does this parent have to participate in mandatory activities? Yes/No	Review the P to E assessment. *No* (review policy as sanction would not be appropriate) *Yes* (continue)
c. If the assessment was not completed, enter the: IRP date Or Appointment Letter date	Review eJAS letter history or IRP for the verification the person was invited to a P to E assessment. Clicking on the appropriate hyperlink will take the user to the client's eJAS 'Letter History', ACES 'Letter History', or the 'IRP History'. The user will select the appropriate letter or IRP which reflects the scheduled appointment by clicking the adjoining radial button. This will auto populate the date field on the tool and bold the selection.
d. If this is a 2 parent household, did the other parent complete an assessment after the child was born and/or before claiming the infant exemption? Yes/No/NA	Review the other parent's eJAS notes and P to E assessment by using the "Two Parent Household" link at the top of the NCS eJAS tool. *No* (continue to question #6e) *Yes* (enter the assessment date) *N/A* (skip to question #7)
Enter the assessment date	Clicking on the hyperlink 'Assessment History' will take the user to the clients list of assessments. The user will select the correct assessment date by clicking the adjoining radial button. This will auto populate the date field on the tool.
e. If the assessment was not completed, enter the date of the appointment letter or IRP.	Review eJAS letter history or IRP for the verification the person was invited to a P to E assessment. Clicking on the appropriate hyperlink will take the user to the client's eJAS 'Letter History', ACES 'Letter History', or the 'IRP History'. The user will select the appropriate letter or

	IRP which reflects the scheduled appointment by clicking the adjoining radial button. This will auto populate the date field on the tool and bold the selection.
Text box: Comments are optional	WFPS/SW may wish to enter comments of scheduled appointment, missed appointments, assessment findings, etc.
7. Is the person receiving Equal Access (EA) services? Yes	This is auto filled from the ACES on-line EA screening. Yes will appear if the person is receiving EA services. All individuals must be screened at application, recertification or as needed for EA services.
a. If the person was not identified in ACES as needing EA services, is there any indication an EA screening should be done before making the sanction decision? Yes/No	Review eJAS and ACES case notes. *No* (continue to question #8) *Yes* (continue to question #7b)
b. Is the EA Plan being followed? Yes/No	Review the EA Plan in ACES On-line, or ACES DEM screen for services needed. Determine if accommodations are being met. *No* (consider if sanction is appropriate) *Yes* (continue)
8. Has the person requested interpreter services or translated letters and notices? Yes/No	Review eJAS, ACES ADDR screen and ACES On-line when determining if the person has requested interpreter services. *No* (continue) *Yes* (continue)
a. Are the parent's letters translated? Yes/No	If interpreter services have been requested review the AOL letter history and DMS ensuring letters/notices were translated. *No* (continue) *Yes* (continue)
9. In reviewing the case, did the department identify any new barriers to participation? Yes/No	Review eJAS notes, assessments, CE, ACES On-line, and narratives for barriers *not* previously identified. *No* (continue) *Yes* (continue)
Text box: If yes, enter summary of barriers identified and how the department plans to respond.	Comments are optional if the answer to question #9 is *No*. Comments are mandatory if the answer to question #9 is *Yes*. If yes, document: • The record was reviewed and what barrier was newly identified • How will this barrier make it difficult for the person to participate • How the Department's plans to respond to this newly identified barrier Note: Consider modifying the IRP to address the barrier/s
10. Did the department respond appropriately to barriers we knew about that would make it difficult or impossible for a parent to successfully participate in WorkFirst activities? Yes/No/NA	Review eJAS notes, assessments, CE, ACES On-line, and narratives for known barriers both old and new. Ensure that known barriers were addressed and resolution was attempted. *No* (consider if sanction is appropriate and modify the IRP, if necessary) *Yes* (continue)
Text box: If yes, enter summary of barriers identified and how the department responded.	Comments are optional if the answer to question #10 is *No*. Comments are mandatory if the answer to question #10 is *Yes*. If *yes*, document: • The record was reviewed and all barriers (old and new) were identified and addressed and resolution was attempted. • Whether the individual refused services

	• Whether the individual informed the Department these barriers were resolved • How barriers were resolved
11. Did the department mitigate risks for families who are currently involved with Children's Administration by: Yes/No/NA a. Contacting the Children's Administration to find out if they are working with the family. If so, let the social worker know the family faces non-compliance sanction. b. Inviting the Children's Administration social worker to the non-compliance case staffing	Review eJAS case notes to identify if the family is working with CA. If unknown, check Client Registry or FAMLINK for activity with Children's Administration. If the family is involved with CA, ensure: • CA is invited to the case staffing • Document if CA participated in the case staffing Note: CA requirements must be supported and incorporated into the IRP.
Client Registry Link	Review Client Registry for CA involvement. If case record indicates some concern, but nothing is found in Client Registry, contact your local CA by email or phone to verify.
Save/Pend Section	The user can click here to save and pend the document
12. Was the person given an opportunity to establish good cause and told what activities they did not do? Yes/No	Review ACES On-line letter history to locate the letter inviting the person to this good cause case staffing appointment. The letter must advise the person: • Who is being set-up for the good cause appointment (specific person in the free-form text) • What was not done (specific activity in IRP) • The date and time of the good cause appointment • They can invite anyone they want to the case staffing
Enter 085-01 letter date	Clicking on the hyperlink 'ACES Letter History' will take the user to a list of AOL 085-01 letters organized by date and time. The user will review in ACES on-line (if necessary) and select the correct 085-01 letter date and time by clicking the adjoining radial button. This will auto populate the date field on the tool.
a. Was the person advised they could invite anyone they wanted to the case staffing? Yes/No	Review the AOL letter 85-01 to ensure the person was advised of this *No* (consider whether sanction is appropriate) *Yes* (continue)
Text box:	User may enter comments if necessary
13. Was an NCS Case Staffing held with appropriate WorkFirst partners and other providers working with the family? Yes/No	Including the WFPS/SW, there must be at least one other professional present when conducting the case staffing. *No* (consider whether sanction is appropriate) *Yes* (continue)
a. Enter the NCS Case Staffing date	Click on the calendar to select the appropriate date
Attendee List	Click on the 'Attendee List' link to enter all who participated in the good cause case staffing.
14. Did the parent attend the NCS Case Staffing either in person or by phone? Yes/No	*No* (the user will be able to answer the second a & b) *Yes* (the user will be able to answer the first a, b, c & d)
*Note: The following group of questions and text boxes are available if the answer to question #14 is **Yes***	
a. Did you discuss the following with the parent? Yes/No	Discuss with the person during the case staffing: • Re-engagement • Benefits of Participation • NCS policy • How to cure sanction • The opportunity to build a new IRP *No* (consider whether sanction is appropriate) *Yes* (continue)

Text box: Describe how this was completed.	Comments are mandatory. Document the key elements of the case staffing, these include: • Whether the person attended the case staffing in person or by phone. • There was a discussion of the circumstances of the case. • Who was involved? Who were the relevant professionals in attendance? • Identify the client's issues, strengths, concerns, and the anticipated duration of those issues or concerns. • Was the case reviewed and were past/current barriers and concerns appropriately acted upon? • Create a joint action plan with time frames. • Review the EA plan and take appropriate steps to modify the accommodation plan as needed.
Child Safety Plan	
b. Did we discuss the parent's plan for supporting their family once TANF is terminated for refusal to participate? Yes/No	The WFPS/SW is required to discuss the three Child Safety Review questions and provide the information packet of local resources at the NCS Case Staffing (if the person shows up). If the person does not show to the NCS Case Staffing, make sure the parent is mailed the information packet.
c. Did we inform and provide information to the parent of the possible continuation of Medicaid and Basic Food assistance if the parent is terminated? Yes/No	
d. Did we discuss and provide information of other community resources that are available to help meet the family's needs? Yes/No	*No* (consider whether sanction is appropriate) *Yes* (continue)
Text Box: Describe how this was completed	Comments are mandatory Document the Child Safety Review was completed by acknowledging the three questions were discussed with the client and whether the information packet was given or mailed.
*Note: The following two questions and text box are available if the answer to question #14 is **No***	
a. Was the decision based on the available information? Yes/No	Review and discuss eJAS, ACES, DMS history for all available relevant information with the attendees. • Identify the client's issues, strengths, concerns, and the anticipated duration of those issues or concerns. • Was the case reviewed and were past/current barriers and concerns appropriately acted upon? *No* (consider whether sanction is appropriate) *Yes* (continue)
b. Did we mail them information about continued medical and food assistance and the list of community resources they may need? Yes/No	The WFPS/SW is required to mail the information packet of local resources (if the person did not show). *No* (consider whether sanction is appropriate) *Yes* (continue)
Text Box: Describe the decision and how the community resources were provided	Comments are mandatory Document the key elements of the case staffing were conducted. They include: • Circumstances of the case were reviewed and discussed. • Who was involved? Who were the relevant professionals in attendance? • Identify the client's issues and strengths. • Past and/or current barriers were appropriately acted upon. • The information packet of local resources was mailed.
15. Based on the NCS Case Staffing and Review Criteria, should the person be referred to the Supervisor or CSO	*No* (cancel this NCS eJAS tool)

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Designee for sanction? Yes/No	*Yes* (continue)
Text Box: Provide a summary of the decision	Comments are mandatory Review and provide a summary of why the Department decided the sanction was appropriate and why the case is being recommended for sanction.
Save/Pend Section or Save/Complete Section	WFPS/SW should click Save/Pend if the NCS eJAS Tool is not complete. WFPS/SW should click Save/Complete to forward the NCS eJAS Tool to the Supervisor/Designee for review. Once the user has satisfied all edits, they will be taken to the case staffing results letter.
Section	**Supervisor or CSO Designee**
16. Supervisor or CSO Designee, after review of this, do you approve for sanction? Yes/No	The Supervisor/Designee: • Routinely monitors the Clients Awaiting Sanction/Term/Recon Approval report. • Reviews eJAS, ACES, DMS, AOL and all entries for accuracy and clarity (questions 1 – 15). *No* - reopens questions 1-15 of the tool and sends back to WFPS/SW to fix and resubmit. *Yes* - provides approval to sanction.
Text Box: Provide a summary of the decision	Brief comments are optional if the answer to #16 is *Yes* Brief comments are mandatory if the answer to question #16 is *No*
Save/Pend Section or Save/Complete Section or Stop/Complete Do Not Refer	Supervisor/Designee should click Save/Pend if review is not complete. Supervisor/Designee should click Save/Complete when the review is complete. This will remove the person from the Clients Awaiting Sanction/ Term/Recon Approval report and update the "Approved/Not Approved" column of the NCS Review Pathway report accordingly. ***Stop/Complete Do Not Refer*** closes the tool entirely.
Section	**CSO WorkFirst Program Specialist/WorkFirst Social Worker**
17. Was an adverse action letter sent to the parent 10 days prior to the sanction effective date listing the following information? Yes/No • Who is being placed in sanction (specific person) • What they failed to do (specific activity) • That the specific person is in sanction status • The penalties that will be applied to the grant • When the penalties will be applied • Fair hearing rights • How to end the penalties and get out of sanction status	The WFPS/SW routinely monitors the NCS Pathway report for the Supervisor/Designee decision. If the case is sent back for rework, make the necessary corrections and resubmit to this tool to the Supervisor/Designee. If the case is denied, the WFPS/SW must click the Complete/Do Not Refer to Sanction Review Panel button which permanently closes this tool. If the case is approved for sanction, the WFPS/SW will: • Process the sanction in ACES and eJAS • Send the AOL 08-01 Change in Benefit letter with all required information included • Complete question #17 of the NCS eJAS tool *No* (consider if sanction is appropriate) *Yes* (continue)
Enter ACES letter date	Clicking on the 'ACES Letter History' link will take the user to ACES letter history. The user will review letter history to identify the letter which notified the person of the sanction being imposed. This is usually an AOL 08-01 Change in Benefits letter; however, it can also be a Benefit Award letter. The user will enter the date of the letter in the field.

Enter Sanction effective date	WFPS/SW will review ACES and ACES On-line to determine the sanction effective date and enter the corresponding date using the calendar (enter the date sanction was imposed).
Select one sanction reason code:	WFPS/SW will review the sanction reason on the AOL 85-01 and/or AOL 08-01. Enter *one* reason from the drop down box.
Save/Pend Section	WFPS/SW should click Save/Pend after completing question #17. Continue to monitor this case and offer monthly re-engagement opportunities.
18. Is this case ready for full family sanction termination?	Complete question #18 when the person has received two months of reduced sanctioned cash benefits.
Yes – Identify the months TANF was reduced due to sanction	Review ACES (benefit history) to identify the month and year of sanction reduction. Click *Yes*.
Month 1/Month 2/Month 3/Month 4	Click on Month 1 to enter the first month and year that cash benefits were reduced. Click on Month 2 to enter the second month and year that cash benefits were reduced. Click on Month 3 to enter the third month and year that cash benefits were reduced or are anticipated to be reduced Click on Month 4 to enter the fourth month cash benefits are anticipated to be reduced.
No - Enter the date sanction was cured or lifted	Review ACES and eJAS for sanction cure/lift date. Click *No* and the corresponding date sanction was cured or lifted.
Text Box: After reviewing the recent case history and the sanction decision, provide additional comments of attempts to re-engage	Comments are mandatory Review the NCS eJAS tool entries and case notes to summarize why the department decided the sanction was appropriate, outline the attempts to re-engage the family, and why the case is being referred for termination.
Stop/Complete Do Not Refer	If *No* is selected, the WFPS/SW should click Stop/Complete Do Not Refer button to permanently close this tool.
Save/Pend Section or Save/Refer to Supervisor	WFPS/SW should click Save/Pend if the NCS eJAS Tool is not complete or not ready to send to the supervisor. WFPS/SW should click Save/Refer to Supervisor to notify the Supervisor/Designee the NCS tool is ready for review.
Section	**Supervisor or CSO Designee**
19. **Supervisor or CSO Designee, after review of questions #17 and #18, do you approve this person for TANF termination? Yes/No**	The Supervisor/Designee: • Routinely monitors the Clients Awaiting Sanction/ Term/Recon Approval report. • Reviews eJAS, ACES, DMS, AOL and entries for accuracy and clarity (questions 17 & 18). Supervisor/Designee may select: Y*es* – this approves TANF termination. *No* - This will either send the case back to the WFPS/SW to fix and resubmit the tool or will deny the case, depending on which button is selected at the bottom of the section. Note: The WFPS/SW monitors the Clients in Sanction report for the decision. If *no* is selected the WFPS/SW will: • Review the comments, • Fix the error(s) and obtain new signatures, • Resubmit if and when appropriate, or • Click the Complete/Do Not Refer to Sanction Review Panel button to permanently close this NCS eJAS tool.

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Text Box: Additional comments, as needed, if you do not support this referral.	Comments are mandatory, and should be brief, if the answer to question #19 is *No*. Comments are optional, and should be brief, if the answer to question #19 is *Yes*.
Save/Pend Section or Save/Refer to Case Manager or Submit NCS Decision	Supervisor/Designee should click Save/Pend if review is not complete. Supervisor/Designee should click Save/Refer to Case Manager when if the case needs to be sent back to the WFPS/SW for correction. Supervisor/Designee should click Save/Complete when the review is complete.
Section	**Request for NCS Reconsideration**
Text Box: **State the reason for the Reconsideration Request** (What item was cited as missing? Where can it be found? How is the decision inconsistent with the intent of the policy?)	The WFPS/SW will complete this section *if* they wish to request reconsideration of the denial.
Save/Pend Section or Save/Complete Section or Cancel Reconsideration	WFPS/SW should click Save/Pend if the Reconsideration Request is not complete. WFPS/SW should click Save/Complete to forward the Reconsideration Request to the Supervisor/Designee. This will also update the Clients in Sanction section of the CLMR to identify the case as reconsideration. To stop the reconsideration process, the WFPS/SW must click Cancel Reconsideration. This will complete the NCS eJAS tool.
Section	**Reconsideration Decision**
Once the case has been referred for reconsideration by the WFPS/SW, it will go to the Supervisor/Designee for decision. If there are any questions regarding the reconsideration, the Supervisor/Designee is encouraged to contact the Regional WorkFirst Coordinator for assistance or clarification.	
Do you agree with the CSO Request for Reconsideration to terminate the case? Yes/No	*No* (denies the cash termination and permanently completes the NCS eJAS tool) *Yes* (approves the cash termination)
Denial Reason Codes (3 reasons may be selected if necessary)	The Supervisor/Designee will provide a reason for the denial by selecting one to three reasons from the drop down menu.
Text Box: Describe the reason you disagree with the recommendation to terminate the case including what non-compliance sanction criteria was not met.	Comments are mandatory if the answer to question is *No.*
Save/Pend Section or Submit NCS Decision	Supervisor/Designee will click Save/Pend if the review is not complete. Supervisor/Designee will click Submit NCS Decision when the review is complete.