

3.6.1 Time Limit Extension Decisions

Updated: ~~June 11~~ ~~July XX01, 2020~~ 2021

Effective July 1, 2021, due to the Post-Pandemic Time Limit Extension from ~~the dates of 7/1/21 through 6/30/22~~, staff approve TLE reviews using 'Caring for a disabled adult' (category 6) in the eJAS TLE review tool:

- **Staff open 'CO' component in eJAS when client is affected by COVID-19 only until September 1/August 30, 2021.**
 - **Staff ~~will not~~ open a 'ZB' component in eJAS for Post-Pandemic TLE approvals.**
- **All Post-Pandemic TLE approvals are to be approved until ~~date~~ 6/30/22.**

Legal References:

- [RCW 74.08A](#)
- [WAC 388-484-0005, 0006 and 0010](#)

3.6.1.5 What are the time limit extension categories?

The entire assistance unit is ineligible for TANF/SFA when an adult recipient/ineligible parent in the assistance unit receives 60 months of TANF/SFA, unless the adult recipient/ineligible parent qualifies for a time limit hardship extension.

The entire assistance unit remains eligible for TANF/SFA if at least one parent has 60 months or more and qualifies for an extension.

Examples:

#1 Jasmine is on SSI and has received 45 months on TANF for her two children. She marries Albert and he is added to the TANF grant. When Jasmine reaches 60 months she will qualify for a time-limited extension and the TANF grant will continue. When Albert reaches 60 months, they will continue to be eligible because Jasmine hit 60 months first and qualifies for the TLE as long as she is on SSI.

#2 Tommy has been on receiving TANF for himself and his son for 55 months. He married Tina who is on SSI and has a daughter who has been on TANF for 30 months. Tommy doesn't qualify for a TLE and the three person TANF grant will close when Tommy's 60 months on TANF unless he qualifies for an extension.

A caregiver relative who doesn't live with the child's parent and has 60 months or more of TANF/SFA may choose to receive a child-only grant as allowed under [WAC 388-408-0025\(2\)\(c\)](#). There are no time limits for child-only TANF cases.

An adult recipient/ineligible parent may qualify for a time limit extension (See #4 through #11 on the [Time Limit Hardship Extension chart](#)) when the adult recipient/ineligible parent:

1. Qualifies for an exemption under [WAC 388-310-0350](#); because they are:
 - A needy caretaker relative age 55 or older (#4); or
 - Applying for SSI as required in their IRP (#8); or
 - An adult with mental, physical, emotional or cognitive condition, based on medical evidence, that prevents them from working more than 10 hours per week and is expected to last 12 months or longer (#5) or,
 - Receiving SSI or Social Security Disability Insurance (#5) or,
 - Caring for a child or adult with a disability (#6 or #7).
 - Homeless, living outside; in a building or other location not meant for human habitation, in a building or other location which they have no legal right to occupy, in an emergency shelter, in a temporary housing program, which may include a transitional housing program with a limited duration of stay (#14); or
 - Homeless per McKinney-Vento criteria; focuses on the unhoused youth in the household. A youth who does not have fixed, regular, and adequate nighttime residence. Local school districts use the McKinney-Vento definition to determine how many households are lacking a nighttime residence and provides access to resources such as free lunch, transportation, and educational supports.
2. Participates satisfactorily in specialized family violence activities according to a service plan developed by a person trained in family violence (#9);
3. Has an open child welfare case with a state or tribal government and this is the first time the adult recipient/ineligible parent has had any child in dependency (#10);
4. Works 32 hours or more per week in an unsubsidized job (#11). Use the ACES calculated number of hours for self-employment unless the person chooses to provide alternative proof from a credible, knowledgeable, reliable source to confirm self-employment hours (see [WAC 388-490-0005](#)). Please note this alternative proof doesn't affect how we determine actual hours of participation or whether we allow the adult recipient to engage in full-time employment as described in the [WorkFirst Handbook 8.2, Self-employment](#);
5. Is 65 years old, or older, blind as defined by the Social Security Administration or likely disabled as defined under chapter [388-449 WAC](#) (#5).

Base the determinations for time limit extensions on whether the adult recipient/ineligible parent meets the criteria for an extension. See the [Time Limit Hardship Extensions chart](#) for more details about the extension categories, criteria, required documentation, participation requirements and review cycle.

Note: The homeless TLE extension category is open for 6 months in duration. The TLE must not be updated before the 6 month duration expires, unless the recipient/ineligible parent stops participating as required to obtain stable housing.

Homeless TLE examples:

1. Rita was approved for a 6 month TLE due to experiencing homelessness. She participated with her local coordinated entry and obtained housing three months into her TLE. Rita reported to her WFPS she established housing at the third month. Her WFPS let her know she had three months remaining left in her extension, and at month 6, unless she meets another hardship TLE category, her grant will close.

2. Steven was approved for a TLE due to experiencing homelessness. At month 6, Steven was still unable to find housing. He met with his WFPS, completed a new time limit extension review. He was engaging in activities to locate stable housing and met the homeless TLE for an additional 6 months. A new IRP was developed with his WFPS to continue to participate in activities to secure stable housing.

Note: An adult recipient/ineligible parent may qualify for more than one time limit extension at a time. WFPS/WFSSS reviews the case and marks all extensions that apply to the adult recipient/ineligible parent in the eJAS time limit tool and eJAS will use the extension with the longest duration to extend TANF/SFA.

eJAS will use any other approved extension if an adult recipient/ineligible parent no longer qualifies for the longest duration time limit extension.

Homeless TLE examples for households who are homeless or caring for a homeless child as defined by the McKinney-Vento Act:

- Children and youth sharing housing due to loss of housing, economic hardship or a similar reason
- Children and youth living in motels, hotels, trailer parks, or camp grounds due to lack of alternative accommodations
- Children and youth living in emergency or transition shelters
- Children and youth whose nighttime residences such as but not limited to:
 - cars
 - parks
 - public spaces
 - abandoned buildings
 - substandard housing
 - bus or train stations
 - sleeping on a park bench

Examples:

1. Maria is homeless, staying in a storage shed at night with her two children on a friend's property. Maria is applying for a homeless TLE due to McKinney-Vento, as a needy household. She declares she does not have a permanent nightly residence, her school district verifies her daughter meets McKinney-Vento eligibility. She is approved for a homeless TLE hardship for 6 months. She develops an IRP with her case manager for housing related activities to establish safe and stable housing.
2. Jada and her two children, Cory and Mikal, are living in a shelter, they meet McKinney-Vento criteria due to an unstable nightly residence. She is approved for a homeless hardship TLE. She develops an IRP with her case manager for housing related activities to establish safe and stable housing.
3. Fatima lost her job and had to move in with her parents. Her son Muhamad meets McKinney-Vento due to sharing housing with Fatima's parents, due to an economic hardship. She develops an IRP with her case manager for housing related activities to establish safe and stable housing and any stackable activity to obtain employment or employment related activities.
4. Jose is an undocumented father of two children and one niece. He is applying for cash for his niece. He has exhausted 60 months of TANF and is only applying for his niece, Blanca, due to her moving in with him. her Blanca's family is seeking housing but can't have her living in their current unstable location. Jose would may be approved for a TLE due to his niece Blanca meeting McKinney-Vento eligibility criteria. A TLE tool will needs to be completed for using the caring for a homeless child TLE extension category. Jose does not have an IRP due to being a non-needy caregiver caretaker relative.

TANF/SFA ends when an adult recipient/ineligible parent no longer meets time limit extension criteria or TANF/SFA eligibility criteria during the hardship time limit extension.

3.6.1.16 Time Limit Extension Decisions - Step-by-step guide

Prior to interview/appointment:

1. The adult recipient/ineligible parent receives a prominently displayed notice of the months of TANF receipt on the recertification notice as they approach 48 months on TANF/SFA.
2. Once the adult recipient/ineligible parent reaches 56 months on TANF, the eJAS demographic screen updates and the WFPS/WFSSS has access to the eJAS time limit tool to process a decision.
3. Once the adult recipient/ineligible parent reaches 58 months on TANF/SFA, the adult recipient/ineligible parent's case appears on the CLMR indicating a required time limit extension decision by the end of month 58 (when possible) and no later than the end of month 60.
4. The WFPS/WFSSS sends an ACES Online 50-05, General Appointment Letter or the eJAS appointment letter and:

1. Notifies the adult recipient/ineligible parent when they will reach 60 months and the need for a time limit extension decision, and
2. Gives the adult recipient/ineligible parent at least 10 business days' notice, to come to the scheduled appointment. The adult recipient/ineligible parent can waive the appointment and complete the time limit interview sooner. Document in the TLE tool, the recipient/ ineligible parent waived the 10 business days' notice, - over the phone or in person.
3. In the letter canned text, needs to be added, the recipient/ineligible parent "has the ability to bring a person of their choosing to the appointment."

3.—WFPS/WFSSS adds AP component with end date to match scheduled TLE appointment.

At the Time Limit Extension appointment, the WFPS/WFSSS:

1. Explains the TANF/SFA time limit policy.
2. Reviews the adult recipient/ineligible parent's TANF/SFA months for accuracy, including the adult recipient/ineligible parents out of state or tribal TANF months.
3. Discusses the available supports, such as transitional food or medical, for those who don't qualify for a time limit extension and provides the adult recipient/ineligible parent a list of community resources.
4. Uses the [Time Limit Hardship Extension Chart](#) to determine whether the adult recipient/ineligible parent qualifies for one or more extensions.
5. Makes the TLE decision based on the evidence available, and requests any additional necessary evidence for a hardship determination using an IRP (or a Missing Verification for Interview pend letter (0023-01) for ineligible parents). If approval for a TLE hardship is found, the WFPS/WFSSS, approves the case and completes the eJAS time limit extension tool to document the appointment and the time limit extension decision.
6. If the TLE decision is a denial, a supervisory or designee review must be completed prior to completing the eJAS time limit tool.
7. Backs out of the TLE eJAS tool, due to further review of the case.
8. Refers the case by email to the supervisor or designee for further review.
9. Documents in note type **Time Limit Extension**, the TLE is pending due to request for denial if the individual does not meet a TLE hardship category, for supervisory or designee review.

At the Time Limit Extension review, the supervisor or designee:

1. Reviews all cases forwarded for review, to determine if all denials have met policy and procedures through the TLE process.
2. Uses the [TLE Supervisory Review Reference Guide](#) and the [Time Limit Hardship Extension chart](#) to review the case.
3. Staffs cases with the case manager if a step has been missed in the TLE process or further questions arise.

4. Responds to all TLE cases from the case manager within 72 business hours with a response to the case manager.
5. Documents in note type Time Limit Extension, the case was reviewed and the determination of the supervisory or designee review.

After the Time Limit Extension interview/appointment, the WFPS/WFSSS:

1. Refers the adult recipient/ineligible parent for a TLE disability evaluation when available medical evidence doesn't meet the severity or duration requirements for the disabled adult TANF/SFA exemption.
 - a. The disability specialist:
 - i. Follows the [Disability Determination Process](#) to determine eligibility.
 - ii. Communicates the determination to WF Staff.
 - b. The WFPS/WFSSS:
 - i. Denies the TLE if disability specialist determines the adult recipient/ineligible parent's condition does not meet ABD criteria.
 - ii. Approves the TLE, using the XB reason code, if disability specialist determines the adult recipient/ineligible parent's condition meets ABD criteria.
2. Documents the evidence used to make the decision in the free form text box of the eJAS time limit tool, using language from the eJAS time limit denial letter template or the [Time Limit Hardship Extension chart](#) if the adult recipient/ineligible parent doesn't qualify for a time limit extension.
3. **Saves the letter.** Or, for non-English letters, print, **translate and hold** (without imaging in DMS) the Time Limit Decision Letter. If the adult recipient/ineligible parent doesn't qualify for an extension, eJAS will enter the information on the ACES TWEP Screen and ACES automatically creates the 10-day notice to extend or close TANF/SFA when the adult recipient/ineligible parent reaches 60 months.
 - a. During month 60, ACES sends out extension approvals and English extension denial letters. When receiving a Barcode tickle for extension denial letters needing translation, the WFPS/WFSSS:
 - i. Sends a copy of the translated eJAS denial letter for imaging.
 - ii. Translates the ACES termination notice if it's in a non-supported language.
 - iii. Locally prints and mails the translated ACES and eJAS letters to the adult recipient/ineligible parent in one envelope.
 - iv. Documents that the letters were sent in the eJAS time limit note type.
 - v. Clears the Barcode tickle.
4. Determines time limit extension eligibility decision based on available information if the adult recipient/ineligible parent doesn't show up for the time limit extension appointment.

When the adult recipient/ineligible parent offers additional evidence before their case closes, the WFSSS/WFPS:

1. Documents the adult recipient/ineligible parent contact and type of new evidence received in the eJAS time limit note type.
2. Uses the IRP (or a Missing Verification for Interview (0023-01) pend letter for ineligible parents) to request additional information within 10 days, or no later than the last day of the adult recipient/ineligible parent's 60th month.
3. Schedules an appointment if the adult recipient/ineligible parent wants to meet and discuss the updated information.
4. Uses the new medical evidence to determine eligibility for a time limit hardship extension.
5. Makes the decision based on existing information in the case if the adult recipient/ineligible parent fails to provide new evidence by the required date.
6. Uses the eJAS time limit tool to determine eligibility for a time limit extension and document the decision. If the decision is denied, follow all steps in the WorkFirst Handbook section, [3.6.2.1](#).
7. After the supervisory review, the WFPS/WFSSS completes the TLE tool and prints and translates the eJAS time limit decision letter, as needed (adding any needed details per the [Time Limit Hardship Extension chart](#)).

When a former adult recipient/ineligible parent states they qualify for a time limit extension after their case closes, they will need to reapply. The WFPS/WFSSS will use the application process and:

1. Completes a family violence screening along with the time limit interview and the intake interview.
2. Discusses the living situation to determine if there are housing barriers for the adult recipient/ineligible parent.
3. Approves (if documentation is available and meets the TLE hardship criteria.)
4. If the adult recipient/ ineligible parent doesn't qualify for a time limit extension, follow the WFHB section [3.6.2.1](#).
5. After supervisory review, denies the time limit extension tool in eJAS.
 - a. If the adult recipient/ineligible parent's case is terminated for another reason and the recipient/ineligible parent was eligible for an extension, review to ensure they still meets the extension criteria. Another eJAS time limit tool completion is not needed.
 - b. Determines eligibility for Pregnant Woman's Assistance (PWA) if the parent is pregnant.
6. Gives them a pending letter for any information needed to determine financial, disability and time limit extension eligibility. Complete the CE if the adult recipient/ineligible parent is likely to qualify for TANF, including those the WFPS/WFSSS expects to meet the time limit extension criteria.

7. Uses WorkFirst support services, categories 34 (testing/diagnostic) and/or 37 (medical exams/services) or Washington Apple Health (if services are available in the area) to pay for necessary medical evidence for recipient/ineligible parents as described in [WFHB 6.6](#), Disabilities, How do I pay for medical evidence.
 - a. See [section 3.6.1.6](#) for ineligible parents.
8. If adult recipient/ineligible parents claiming mental or physical health issues don't qualify for a time limit extension with current medical evidence, refer adult recipient/ineligible parent to a disability specialist for the Sequential Evaluation Process (SEP) for TANF TLE.
 - a. Deny the extension in the eJAS time limit tool and the application will remain in pending status if you can't determine TANF time limit extension eligibility without further information from the disability specialist.

Note: The disability specialist follows the instructions in the Social Services Manual – [PWA](#) or [disability determination](#) if the adult recipient/ineligible parent is pregnant or claims a mental or physical health issue prevents them from working, to determine ABD eligibility, and communicates the determination to WF staff

The WFPS/WFSSS:

- a. Denies the TLE if the adult recipient/ineligible parent's condition does not meet ABD criteria.
- b. Follows the WFHB section [3.6.2.1](#), to refer the denial to a supervisor or designee for further review.
- c. If an approval is the decision the WFPS/WFSSS uses the XB reason code, if the adult recipient/ineligible parents condition does meet ABD criteria.
- d. Approves the TLE, using the XB reason code, if the adult recipient/ineligible parents condition does meet ABD criteria.

After supervisory review or designee review, if the adult recipient/ineligible parent doesn't qualify for an extension the WFPS/WFSSS adds the appropriate free form text from the eJAS denial letter template or the Time Limit Hardship Extension Chart to the ACES denial letter explaining, their case was reviewed by the case manager, a supervisor and/or a regional designee, and why the adult recipient/ineligible parent does not qualify for an extension. No separate eJAS time limit extension denial letter required.

1. Sends a separate ACES approval letter when the adult recipient qualifies for PWA due to pregnancy with the canned text from Barcode, titled "HEN Referral for PWA Participants."
2. Creates a Housing and Essential Needs (HEN) referral letter, (PWA Housing and Essential Needs Referral, 10-651,) in Barcode.
3. Gives the referral letter to the PWA recipient.

4. Completes a First Steps assessment with the PWA recipient, per [WFHB Chapter, 6.2 Assessment](#).

If the adult recipient/ineligible parent files an administrative hearing because benefits are terminated and qualifies for continued benefits:

1. The worker processing the administrative hearing request will notify the WFPS/WFSSS.
2. The WFSSS/WFPS will enter continued benefits due to the administrative hearing into the eJAS time limit tool to continue cash aid.
3. If the ALJ rules in favor of the adult recipient/ineligible parent, process the ALJ approved extension into the eJAS time limit tool.
4. If the department's decision is upheld by the ALJ, close the administrative extension and enter specialized text into the ACES termination notice.

Resources

Related WorkFirst Handbook Chapters

- [3.2 Comprehensive Evaluation](#)
- [3.3.1 IRP](#)
- [6.1 Resolving Issues - Overview](#)
- [6.5 Family Violence](#)
- [6.8 Exemptions](#)

Forms & Other Resources

- Domestic Violence Hotline for general public 1-800-562-6025
- EA-Z Manual - [TANF/SFA Time Limits](#)
- EA-Z Manual - [Time Limits Overview](#)
- Family Violence Technical Assistance for all staff working with WorkFirst participants Monday-Friday 9:00 am-5:00 pm (360) 586-1022 Ext 102 or 104
- [Ineligible Parents' Family Violence Plans](#)
- [Ineligible Parent Medical Evidence Desk Aid](#)
- [Letters Process for TANF Time Limit Extension Reviews, Terminations, Reapplications, Denials and Approvals](#)
- [Pregnant Women Assistance \(PWA\) Flow Chart](#)
- [Social Services Manual – Good Cause](#)
- [Social Services Manual - Medical Evidence Requirements](#)
- [Time Limit Hardship Extensions chart](#)
- [TLE Supervisory Review Reference Guide](#)

- Using the Sequential Evaluation Process (SEP) for TANF TLE Desk Aid for WorkFirst
- Using the Sequential Evaluation Process (SEP) for TANF TLE Desk Aid for Disability Specialists