

3.6.2 Approved Time Limit Extensions

Revised ~~April 6, 2020~~ July 1, 2021

Effective March 16, 2020, due to the COVID-19 outbreak, WorkFirst participants are *temporarily suspended* from:

- **Mandatory participation**
- **Home visits**
- **Sanction and sanction termination.**

Effective ~~April-July 1, 2020~~ July 1, 2021, due to the ~~COVID-19 outbreak~~ **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 a 'CO' component in eJAS when a client-participant is affected by COVID-19, only until September August 30-1, 2021.**
 - **Staff ~~will~~ *will not* open a 'ZB' component in eJAS for ~~eases affected by COVID-19~~ **Post-Pandemic TLE approvals.****
- **All Post-Pandemic TLE's approvals are to be approved until 6/30/22**

Legal References:

- *RCW 74.08A*
- *WAC 388-484-0005, 0006 and 0010*

The TANF time limit policy is divided in two separate sub-sections:

Section 3.6.1 – Time Limit Extension Decisions describes how to make TANF/SFA time limit extension decisions.

Section 3.6.2 - Approved Time Limit Extensions describes how to maintain the case once a TANF time limit extension is approved. This section includes:

- **3.6.2.1** What happens when the adult recipient/ineligible parent no longer qualifies for a time limit extension?
- **3.6.2.2** What happens when the adult recipient/ineligible parent with a time limit extension stops participating as required?
- **3.6.2.3** What happens when the adult recipient/ineligible parent with an approved family violence time limit extension stops participating as required in their family violence service plan?
- **3.6.2.4** What happens when the adult recipient/ineligible parent with an approved homeless time limit extension stops participating in activities to obtain stable housing?
- **3.6.2.5** How do I process the case when a time limit extension is about to expire?
- **3.6.2.6** Approved Time Limit Extensions – Step-by-step guide

3.6.2.1 What happens when the adult recipient/ineligible parent no longer qualifies for a time limit extension?

An adult recipient/ineligible parent's circumstances may change once they are approved for a time limit extension. For example, WFPS/WFSSS will be notified on the CLMR that the parent's employment hours have changed and dropped below 32 hours per week. Or, a child dependency issue may be resolved.

Follow the normal financial change and reporting rules when a change in employment hours is reported. Financial will verify hours if the hours drop and ~~the~~ the WFPS/WFSSS must verify hours for all job starts. If the recipient/ineligible parent reports an increase in employment hours, verification isn't required until the next ER or MCR, but check verification obtained to authorize WCCC if available.

When a person no longer qualifies for a time limit extension, a new decision in the eJAS time limit tool can be completed without an ineligible parent's interview, if they meet another hardship exemption category to meet a time limit extension. Review the current tool and make a note of the types and duration of approved extensions and reenter the ones the person still qualifies for in a new eJAS time limit tool. For example, if a parent is approved for a disability and an SSI extension and the WFPS/WFSSS is no longer requiring a parent to pursue SSI, use the eJAS tool to re-approve the disability time limit extension only. Since the parent is still eligible for an extension, there is no need to create an eJAS denial letter for the extension(s) closed.

If the recipient/ineligible parent isn't already approved for another type of time limit extension follow the process in 3.6.1, Time Limit Extension Decisions, to determine if there is a time limit extension hardship category the recipient/ineligible parent might be eligible for.

The WFPS/WFSSS must do the following:

1. Sends an ACES online 50-05, General Appointment Letter or the eJAS appointment letter for a time limit interview. Gives the recipient/ineligible parent 10 business days' notice. The recipient/ineligible parent can waive the appointment and complete the time limit extension interview sooner. Documents in the TLE tool, the recipient/ineligible parent waived the 10 business days' notice, over the phone or in person.
2. In the appointment letter, adds canned text informing the recipient/ineligible parent they, "have the ability to bring a second person of their choosing to the 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 parent's 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 Extensions Chart](#) to determine whether the adult recipient/ineligible parent qualifies for one or more hardship 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 the participant qualifies for a TLE hardship extension, 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 supervisor or designee review must be completed prior to completing the eJAS time limit extension tool.
7. Backs out of the TLE eJAS tool, ~~due, due~~ to further review of the case needed by a supervisory or designee.
8. Refers the case by e-mail to the supervisor or designee, for further review. Documents in the e-mail the client's id and the reason the adult recipient/ ineligible parent does not meet a Time Limit Hardship Extension category, sending for further supervisory or designee review.
9. Documents in the note type Time Limit Extension, the TLE is pended due to request for denial if the participant does not meet a TLE Hardship Extensions category, for further supervisory or designee review.

At the time limit extension review, the supervisor or designee:

1. Reviews all cases forwarded for review due to a denial request, to determine if all denials have met policy and procedures throughout the TLE process.
2. Uses the [TLE Supervisory Review Reference Guide](#) and the [Time Limit Hardship Extensions 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.

3.6.2.2 What happens when the adult recipient with a time limit extension stops participating as required?

Adult recipients with an approved time limit extension must still participate in any WorkFirst activities required in their IRP or go through the sanction process under WAC 388-310-1600. This includes adults who are approved for an SSI extension because they are required to apply for SSI in their IRP. As long as the adult still qualifies for a time limit extension, the WFPS/WFSSS pursues sanction and doesn't close the case until the adult remains in sanction for two months in a row or receives the sanction case closure penalty (when there is no good cause and the participant fails to attend their NCS case staffing and home visit). However, the adult *must* participate in her or his family violence service plan to remain eligible for a family violence time limit extension. Families who meet the TLE due to homelessness, must participate in activities to achieve stable housing. These activities must be developed in coordination with a housing provider or other available resources.

See the next section for information on how to process family violence time limit extensions ~~if their~~ the adult stops following the family violence service plan or activities to resolve homelessness. See also the participation column on the time limit hardship extension chart for a brief description of each extension's participation requirements. See also the [Time Limit Extensions and Sanctions Chart](#).

3.6.2.3 What happens when the adult recipient/ineligible parent with an approved family violence time limit extension stops participating as required in their family violence service plan?

To qualify for a family violence time limit extension, the adult recipient/ineligible parent must participate in activities needed to address the family violence issues according to a service plan developed by a person trained in family violence. When the person stops following their family violence service plan, and refuses to participate, the person would no longer qualify for the extension.

When a WFPS/ WFSSS is notified that the participant is not participating in their family violence service plan the WFPS/WFSSS:

- Schedules a good cause appointment to determine whether the participant has good cause for not participating in the plan. Mirrors the good cause process for ineligible parents (including adjusting activities as needed) but enter the decision in the eJAS family violence case note type. See [Ineligible Parents' Family Violence Plans](#) for more information.
- Schedules and sends an appointment letter for a follow up time limit extension appointment (which can be the same day, but at a different time) in case the participant doesn't have good cause and doesn't intend to participate.
- Uses the good cause interview and the eJAS sanction tool for adult recipients to determine good cause for non-participation and places the adult recipient in sanction if there is no good cause. This will support the decision that the adult didn't have good cause should ~~the adult~~ the adult file an administrative hearing.
- If sanctioned for failure to follow the family violence service plan, find out if the adult will participate in the future. If so, impose sanction, but keep the family violence extension open.
- If the adult recipient /ineligible parent doesn't have good cause for failure to participate and also refuses to start participating in their family violence service plan, use the time limit interview and the eJAS time limit tool to document the person no longer qualifies for the family violence time limit extension. Determine whether the person qualifies for another type of time limit extension, and, if not, closes the case for no time limit extension.
- If the participant does-~~no~~'t attend their appointments, make the determination of good cause and time limit extension eligibility based on the information given.

If the adult recipient /ineligible parent is closed for no time limit extension, later reapplies and now agrees to participate in their family violence plan or activities to obtain stable housing, the extension can be re-approved. Adult recipients' cases are re-opened in sanction and they would need to participate for 28 days and cure their sanction in order to get a full grant.

If the case closes for no time limit extension (229 exceeds the time limit) and non-compliance sanction (252 NCS process) in the same month, the NCS case closure will override the time limit

case closure in ACES and the adult will be required to participate for four weeks, if able, before TANF can be re-opened.

3.6.2.4 What happens with the adult recipient/ ineligible parent stops participating in activities to obtain stable housing?

To qualify for a homeless time limit extension, the adult recipient/ineligible parent must participate in activities to achieve stable housing. These activities must be developed in coordination with a housing provider or other available resources. The adult recipient/ineligible parent must comply with a housing plan, completed by a housing provider, if available. If the adult recipient/ineligible parent stops participating with their IRP requirements, they will no longer qualify for the homeless extension.

Note: The homeless TLE 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.

When a WFPS/WFSSS is notified that the participant stopped participating in activities to achieve stable housing the WFPS/WFSSS:

- Schedules a good cause appointment to determine whether the participant has good cause for not participating in the housing plan or housing activities. Mirrors the good cause process for ineligible parents (including adjusting activities as needed) but enters the decision in the time limit extension note type.
- Schedules and sends an appointment letter for a follow up time limit extension appointment (which can be the same day, but at a different time) in case the participant doesn't have good cause and doesn't intend to participate.
- Uses the good cause interview and the eJAS sanction tool for adult recipients to determine good cause for non-participation and places the adult in sanction if there is no good cause. This will support the decision that the adult didn't have good cause, should the adult file an administrative hearing.
- If sanctioned for failure to follow the housing plan or activities to obtain stable housing, find out if the adult will participate in the future. If they agree to participate in housing activities, impose the sanction, but keep the extension open.
- If the adult recipient/ineligible parent doesn't have good cause for failure to participate and also refuses to start participating in housing activities, use the time limit interview and the eJAS time limit tool, to document the participant no longer qualifies for the homeless time limit extension. Determines whether the participant qualifies for another type of time limit extension, and if, not, closes the case for no time limit extension.
- If the participant does not attend their appointments, the WFPS/WFSSS makes the determination of good cause and the time limit extension eligibility, based on the information given.

If the adult recipient/ineligible parent is closed for no time limit extension, later reapplies and now agrees to participate in their housing plan, the extension can be re-approved. Adult recipient's cases are re-opened in sanction and they would need to participate for 28 days and cure their sanction in order to receive a full grant.

If the case closes for no time limit extension (229 exceeds the time limit) and the non-compliance sanction (252 NCS process) in the same month, the NCS case closure will override the time limit case closure in ACES and the adult will be required to participate for four weeks, if able, before TANF can be re-opened.

3.6.2.5 How do I process the case when a time limit extension is about to expire?

Cases with an approved time limit extension ~~will begin to~~ appear on the CLMR two months before the current time limit extension is slated to end. Begin the review process as quickly as possible as it may take some time for the adult recipient/ineligible parent to provide updated evidence, such as medical evidence for themselves or a disabled family member.

The WFPS/WFSSS:

- Updates the service plan for family violence extensions.
- Contacts the participant in a homeless time limit extension to inquire about housing status and update participation in activities to obtain stable housing.
- Except for SSI/SSDI ineligible parents, obtains new medical evidence for disability and SSI extensions (disabled or caring for a disabled family member) following the process in [WFHB 6.6, Disabilities](#).
- Contacts DCYF for an update on child dependency extensions.
- Uses verification needed to continue an older caretaker relative, SSI parent or employment time limit extension gathered by call center staff during the person's concurrent eligibility review (ER) or mid-certification review (MCR). For older caretaker/employment/SSI extensions, schedules the time limit interview and obtains any needed documentation that won't be obtained during a concurrent ER/MCR following financial eligibility change and verification rules. There is no requirement to follow up and ensure a concurrent ER/MCR was done as the case will close if the person fails to meet review requirements.
- Follows the process in [3.6.1, Time Limit Extension Decisions](#), to decide whether to close the case or approve another time limit extension. That is, schedules an appointment, gathers evidence, completes the eJAS time limit tool and translates the eJAS Time Limit Extension denial letter as needed. ACES will generate a letter to notify the adult recipient/ineligible parent of the result.

3.6.2.6 Approved Time Limit Extensions - Step-by-step guide

1. If the adult recipient/ineligible parent's circumstances change so they no longer qualify for their current time limit extension, the WFPS/WFSSS:
 - a. Determines if the person is already approved for another type of extension. If so, they use the eJAS time limit tool to end the current extension ~~and re-approve~~ any other approved time limit extension(s) through their review date.
 - b. If the participant doesn't appear to qualify for another type of time limit extension, follow the process in [3.6.1, Time Limit Extension Decisions](#), to make a referral to the supervisor or a designee to review the case before a denial can be made.

- c. Backs out of the TLE tool and refers the case to a supervisor or designee via email including the client id, and the reason the adult recipient/ ineligible parent does not meet a TLE hardship category.
 - d. Documents in the TLE note type, sending to supervisor or designee for further review due to a denial request.
2. If the adult recipient/ineligible parent stops participating as required, the WFSSS or WFPS:
- a. Follows the sanction process to determine good cause and pursue sanction, as appropriate.
 - b. Schedules a time limit interview if the adult recipient/ineligible parent isn't participating in their family violence service plan or activities to obtain stable housing.
 - c. Uses the good cause interview and the eJAS sanction tool to impose sanction if the adult recipient/ineligible parent doesn't have a good reason for failure to follow the family violence service plan or participate activities to obtain stable housing. ~~For housing. For~~ ineligible parents, use the good cause interview only, adjust activities as needed and document the results in eJAS family violence case notes.
 - i. Uses the time limit interview and eJAS time limit tool to:
 - A. Determines whether the participant qualifies for another type of time limit extension.
 - B. Documents the time limit approval decision and notifies the person why the participant qualifies for the family violence extension on the eJAS time limit decision letter.
 - C. If a denial is the decision, follow steps above to refer the case to a supervisor or a designee for review before the case can be denied.
3. When the current time limit extension is due to expire, the WFPS/WFSSS will:
- a. Be notified via the CLMR two months before the time limit extension is due to expire.
 - b. Uses a concurrent ER/MCR to gather any needed documentation for the older caretaker relative, SSI parent or employment extension.
 - c. Obtains updates or required evidence for the other time limit extensions.
 - d. Uses the process in 3.6.1, Time Limit Extension Decisions, to determine whether to approve another time limit extension.
 - e. If a denial is the decision, follows steps above to refer the case to a supervisor or designee for review before the case can be denied.
 - f. Puts in the TLE note type the reason for the TLE and e-mails the supervisor or designee to reviews the TLE denial request.
 - g. Modifies the IRP, including any housing activities, ~~and, and~~ updates the family violence service plan and eJAS component codes as appropriate.
 - h. Mails corresponding letters to the participant with the decision of the TLE extension.

Related WorkFirst Handbook Chapters

- [3.2 Comprehensive Evaluation](#)
- [3.3.1 IRP](#)
- [6.6 Disabilities](#)
- [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 Indian Country Disregard](#)
- [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](#)
- [Social Services Manual – Good Cause](#)
- [Time Limit Extensions and Sanctions Chart](#)
- [Time Limit Hardship Extensions chart](#)
- [TLE Supervisory Review Reference Guide](#)