

## 3.1 Overview

The Tools-Overview section includes:

- 3.1.1 What are the tools we use?
- 3.1.2 Tools and techniques
- 3.1.3 Are any additional techniques to use when making contact with a parent participant?
- 3.1.4 What are the tools & Techniques principles?

### 3.1.1 What are the tools we use?

This chapter describes the major tools and techniques we use to help WorkFirst parents-participants succeed. To be fully effective -- most of these tools ~~will~~ rely heavily on the partnerships and communication between the WorkFirst agencies.

The main tools and techniques covered in this chapter ~~are described more fully below and~~ include:

- eJAS tools
  - ~~e JAS Tools~~
    - ~~Comprehensive Evaluation~~
  - Customer Attendance Tracking System (CATS)
- Individual Responsibility Plans (IRPs)
- Predictive Risk Intelligence System (PRISM)
- Stacking Activities
- Intensive services
- Case staffing
- Sanctions,
- Time Limits, and
- Monitoring Participation.

### 3.1.2 Tools and techniques

~~As shown in the chart below, there are several~~ main tools and techniques used to manage a WorkFirst case are listed below with a brief description. ~~Each tool is listed, followed by a brief description.~~

<i>Tools the WorkFirst Program Specialist can use:</i>	
eJAS	eJAS is an automation tool for WorkFirst Program Specialists (WFPS), Social Service Specialists, Community and Technical Colleges, job service specialists, and contracted service providers to identify and document issues that can interfere with employment. Service providers use e-JAS to report participation to the WFPS, in most cases.

CATS	The Customer Automated Tracking System is an electronic system that allows <del>parents-participants</del> to sign in as required and that tracks attendance while engaged in Career Scope services provided by the Employment Security Department.
<u>PRISM</u>	<p><u>PRISM is a Predictive Modeling tool intended to help:</u></p> <ul style="list-style-type: none"> <li>• <u>Identify sources of medical evidence;</u></li> <li>• <u>Identify high medical risk/special needs participants;</u></li> <li>• <u>Identify barriers and/or risk factors affecting employability; and</u></li> <li>• <u>Assist with referral or treatment for chronic health issues.</u></li> </ul> <p><u>Note: Don't <del>u</del>Use of PRISM to gather information for purposes of imposing sanctions for failure to adhere to program standards. <del>is prohibited.</del></u></p>
IRP	An Individual Responsibility Plan (IRP) outlines a <del>parent's-participant's</del> action steps towards self-sufficiency.
Bundled Services	Bundling services <del>is requiring</del> the <del>parent</del> <u>participant</u> to engage in more than one activity at a time - perhaps working with different providers to access services.
Intensive Services	Intensive services are extra or exceptional supports <u>provided</u> to <u>participants</u> <del>help those</del> having the greatest difficulty finding and keeping jobs, <u>and</u> achieve success.
Case staffing	Case staffing is a group process, which creates an opportunity for the WFPS and Social Service Specialist to exchange information about a <del>parent-participant</del> and gain consultation from other professionals and partners.
Continuous Activity Planning (CAP)	<u>Continuous Activity Planning is a</u> An informal consultation or joint evaluation with available WorkFirst partners, DSHS co-workers, or other service providers.
Sanction	A sanction is a status that a <del>person-participant</del> enters when <del>she or he</del> <u>he</u> is able, but refuses to participate as required.
Protective payee	Protective payees are contracted vendors that provide money management to assigned <del>parents-participants</del> to make sure assistance funds are used for basic needs.

### 3.1.3 Are there any additional techniques to use when making contact with a parentparticipant?

~~The following lists~~There are ~~some~~ additional techniques you may ~~want to~~ use in your communication and contacts with parentsparticipants:

- Give ~~parents-participants~~ information verbally and in writing. Take the time required to make sure they understand what is required.
- Let ~~people-participants~~ know why you are asking for information (~~generally~~generally, to determine eligibility or find issues that may require expert help to resolve).
- Use ~~interviewing skills, such as~~ Motivational Interviewing skills and open-ended questions, to get better information. There are some ~~good~~ classes available to help you improve your interviewing techniques and how to handle difficult situations.
- If you have trouble deciding what to do, talk with co-workers, supervisors or community partners. Someone else may know of another resource or an approach you have not ~~yet~~ considered.
- Foster relationships with partner agencies and community based organizations. ~~It doesn't matter whose "client" it is.~~ We ~~all share~~have a common goal and effective coordination can make ~~all~~ the difference in creating effective plans.

### 3.1.4 What are the tools & techniques principles?

It is important to:

Identify and resolve issues that interfere with employment as soon as possible without impeding the ~~parent's-participant's~~ progress towards self-sufficiency.

Document issues, strengths and participation plans on a consistent basis. As ~~we-you~~ get to know each ~~participantparent~~ better, ~~we-you~~ can use new insights to create ~~ever~~ more effective IRPs.

Offer bundled services with job search. Believe in the ~~parent's-participant's~~ ability. Let the job market determine employability--don't make an assumption that the ~~parent-participant~~ cannot succeed.

Spell out, in writing, specific action steps each ~~parent-participant~~ can take to become independent from WorkFirst cash assistance. Even better, ~~we-you~~ can make joint plans with the ~~parent-participant~~ and community partners so everyone is working towards a common goal.

Pool resources and expertise with partners in the community.

Require ~~parents-parent/caregivers~~ to participate as close to full-time as possible to make full use of their time on WorkFirst cash assistance. ~~Parents-Participants~~ can often do more than one thing at a time and work with more than one provider.

Remember, those who can work, should work. ~~Those parents-Participants~~ who are able, but refusing to participate to participate in WorkFirst activities ~~but are refusing to participate~~ will be sanctioned.

## 3.5 Case Staffing

Legal References:

Revised: 8/1/2017

- [RCW 74.08A](#)

The *Case Staffing* section includes:

- [3.5.1](#) What is a case staffing?
- [3.5.2](#) Who needs a case staffing?
- [3.5.3](#) When are case staffings mandatory?
- [3.5.4](#) Who do you involve in a case staffing?
- [3.5.5](#) What are the benefits of a case staffing?
- [3.5.6](#) Case Staffing - Step-by-Step Guide

### 3.5.1 What is case staffing?

Case staffing is an opportunity for the WorkFirst Program Specialist (WFPS) and/or the WorkFirst Social Service Specialist (WFSSS) to exchange information about the person-participant and gain consultation from other professionals. It is a group process in which the case worker (WFPS or WFSSS) invites two or more professionals and others involved with the person-participant to help identify issues, suggest problem resolution strategies, and recommend service options.

~~Key elements to a case staffing include~~ WFPS/WFSSS must:

- Gather demographics (names, ages of family members and others in the household).
- Invite at least two other relevant professionals such as social service specialists or persons from other agencies that ~~have work(ed)~~ with the individual-participant. A minimum of two professionals, the ~~assigned~~ WFPS/~~or~~ WFSSS and at least one other professional ~~are required to~~ must be present to conduct a case staffing.
- ~~Let~~ Advise sanctioned ~~individuals-participants know~~ that they can invite anyone ~~else~~ they choose ~~to~~.
- Document in eJAS Case Staffing notes: ~~where you:~~
  - ~~W~~ Mention who was involved ~~attended~~ (relevant professionals). ~~This should also be listed under the attendee tab.~~
  - ~~Discuss the e~~ Circumstances of the case.
  - ~~Identify the i~~ ssues, strengths, concerns and anticipated duration of issues or concerns. Strengths may be: H.S. Diploma having a high school diploma, stable housing, or reliable transportation. If possible, identify how strengths may help address any barriers such as how the participant-parent's education may be helpful in obtaining employment.
  - ~~Determine if the person~~ Whether you screened the -participant was screened for EA and if there is an EA plan. Take appropriate steps to modify the EA accommodation plan as needed.

- ~~Document that the case was reviewed and p~~Past or present issues and that we addressed them how they were addressed. appropriately acted upon.
- ~~Describe the roles~~Roles and responsibilities of those involved with the ~~individual~~participant.
- Create a joint action plan with time-frames and expected outcomes.
- Non-Compliance Sanction (NCS) Case Staffing Documentation Standard- In addition to the eJAS Case Staffing documentation, you must ~~include the following information:~~
  - Document that you reviewed and discussed all available information ~~was reviewed and discussed~~ with one or more professionals, and
  - Include a ~~An~~ explanation of the decision whether or not to pursue sanction.

### 3.5.2 Who needs a case staffing?

The ~~individual participant~~ may need a case staffing at any point when it appears ~~the person is~~they are not making progress or there are significant issues to address. It is important that you do everything you can for families before they reach 60 months on WorkFirst. Staff should can conduct C case staffings ~~can are to be conducted~~ as early and regularly as possible. Some case staffings are mandatory, others are conducted based on the recommendation of the WFPS, WFSSS, partner agency or contractor such as Community Jobs.

Below are some strategies that local Community Service Offices use to make this effective tool available to a broad range of participants:

- **All Cases-** ~~You can~~ Conduct case staffings on an entire ~~all of the cases in a caseload to ensure all of the participants have been seen, if a reasonable and timely IRP has been developed, and if timely and appropriate referrals were mademet~~ with WF staff, have a reasonable and timely IRP, and have timely and appropriate referrals. This is helpful to maximize participation. This can be an in depth review of the case including identifying issues and action steps addressing the issues. You must invite at least two other professionals such as ~~social service specialists~~SSS or persons from other agencies that have worked with the sanctioned participant~~individual.~~
- **Cases with common characteristics-** Staff common cases (such as all employed, all sanctioned, or all X cases) to develop specialized processes and resources to address the needs of groups of participants. With this type of staffing, you ~~can~~may refer participants to existing services and make plans to fill gaps in services. Depending on the type of case being staffed, staff may invite Employment Security Department, college staff, community jobs contractors, or other community contractors ~~may be involved.~~
- **Difficult cases-** Staff ~~These are the cases discussed in the previous section as in section 3.4~~ Intensive Services. This particular type of case staffing will generally require more time to conduct a review of the case and develop a plan to meet the participant's needs.

- During Career Scope services participation, especially at the twelfth week: Employment Security Department (ESD) and DSHS staff will talk to the participant about ~~discuss~~ options available for the next step ~~the best next steps for participants who have gone through~~ are nearing ~~completing~~ completion of Career Scope services without finding a job. Options include Work Experience (WEX), on-the-job training opportunities, Community Jobs, approved training, including basic education, or additional Career Scope services if appropriate. Local staff should work together to develop processes that will make sure participants ~~do not~~ don't lose momentum in participation as they transition from one activity to another.

### 3.5.33-5.3-When are case staffings mandatory?

Case staffings are mandatory for individuals-participants who h:

~~Have not~~ haven't participated in WorkFirst activities, without good cause, before entering sanction status.

The goal of the NCS Case Staffing is to re-engage the person-participant into appropriate WorkFirst activities.

A good cause/non-compliance Sanction (NCS) case staffing requires the assigned worker to invite two other relevant professionals such as the WFPS/WFSSS, Public Health Nurse, Chemical Dependency Professional, etc. The worker (WFPS or WFSSS) assigned to the case counts as one professional.

It is extremely important to invite a Children's Administration (CA) Social Service Specialist if CA is working with the individual.

For more information regarding good cause/NCS case staffings, please refer to section [3.6.1 Entering Sanction](#).

~~Below are some strategies that have been used by local Community Service Offices to make this effective tool available to a broad range of individuals:~~

- ~~All Cases :~~ You can case staff all of the cases in a caseload to ensure all of the individuals have been seen, if a reasonable and timely IRP has been developed, and if timely and appropriate referrals were made. This is helpful to maximize participation. This can be an in depth review of the case including identifying issues and action steps addressing the issues. You must invite at least two other professionals such as social service specialists or persons from other agencies that have worked with the sanctioned individual. A minimum of two professionals, WFPS/WFSSS and a least one other professional are required to conduct a Case Staffing.
- ~~Cases with common characteristics :~~ Staff common cases (such as all employed, all sanctioned, or all X cases) to develop specialized processes and resources to address the needs of groups of individuals. With this type of staffing, you can refer individuals to existing services

and make plans to fill gaps in services. Depending on the type of case being staffed, Employment Security Department, college staff, community jobs contractors, or other community contractors may be involved.

- ~~Difficult cases~~ : These are the cases discussed in the previous section as Intensive Services. This particular type of case staffing will generally require more time to conduct a review of the case and develop a plan to meet the person's needs.
- ~~During Career Scope services participation, especially at the twelfth week~~: Employment Security Department (ESD) and DSHS staff will discuss the best next steps for individuals who have gone through Career Scope services without finding a job. Options include Work Experience (WEX), on-the-job training opportunities, Community Jobs, approved training, including basic education, or additional Career Scope services if appropriate. Local staff should work together to develop processes that will make sure individuals do not lose momentum in participation as they transition from one activity to another

### 3.5.4 Who do you involve in a case staffing?

As shown in the chart below, depending on the ~~person's~~ participant's circumstances, you may want to invite different people to attend a case staffing.

Most state employees will come at no cost. Support services are available if a psychologist or similar professional needs to be paid, ~~the payment can be made as a support service. Your local region or office may consider~~ In some instances, ~~(like an such as "all case" reviews), it can be considered~~ as staff training and ~~paid pay~~ as a training cost. Other payment options include exception to rule, Department of Vocational Rehabilitation or Division of Developmental Disabilities (DDD) funds, Social Services Payment System dollars, school district support, or Labor & Industries, accommodation and diagnostic money.

~~If attendance by~~ key professionals can't ~~not attend~~ be arranged, then the WFPS or WFSSS should attempt to gather information prior to the staffing through phone calls and/or other correspondence.

WorkFirst staff may not use

Note: PRISM is a useful tool to identify potential issues that prevent participation; however, use of PRISM to gather information for purposes of imposing sanctions for failure to follow through with requirements is prohibited.

<i>Suggested case staffing participants</i>	
Children's special needs	<ul style="list-style-type: none"><li>• DDD case manager</li></ul>

	<ul style="list-style-type: none"> <li>• Child psychologist</li> <li>• Public Health Nurse</li> <li>• Health or Mental Health Provider</li> </ul>
Depression	<ul style="list-style-type: none"> <li>• Mental Health Provider</li> </ul>
Chemical Dependency	<ul style="list-style-type: none"> <li>• Alcohol &amp; Drug Assessment staff</li> <li>• Mental Health provider</li> <li>• Children's Administration staff</li> </ul>
Cultural issues	<ul style="list-style-type: none"> <li>• Refugee service providers</li> <li>• Tribal representatives</li> <li>• Indian Policy and Affairs staff</li> <li>• Migrant &amp; Seasonal Farm Worker representative</li> <li>• Affiliate from Religious Organization</li> </ul>
Wage progression	<ul style="list-style-type: none"> <li>• Community/technical college staff</li> <li>• ESD staff</li> <li>• Employer</li> </ul>
Child care	<ul style="list-style-type: none"> <li>• Child Care Information &amp; Referral</li> <li>• Working Connections Child Care (WCCC) staff</li> <li>• Children's Administration staff</li> </ul>
Job retention	<ul style="list-style-type: none"> <li>• ESD staff</li> <li>• Employment-focused Mental Health Provider</li> <li>• Independent living specialist</li> <li>• Employer</li> <li>• Community/technical college staff</li> </ul>
Family violence	<ul style="list-style-type: none"> <li>• Family violence advocate and/or community service provider</li> <li>• Mental health provider</li> <li>• Children's Administration staff</li> <li>• Attorney of criminal and/or civil case(s)</li> </ul>
Legal, probation & parole	<ul style="list-style-type: none"> <li>• Dept. of Corrections staff</li> <li>• Local judicial staff</li> </ul>



### 3.5.5 What are the benefits of case staffing?

~~In most situations, a e~~Case staffings usually provides another approach to identify concerns by bringing together a multidisciplinary team of experts to review cases, identify resolution strategies, and recommend solutions. Bringing the group together for this purpose increases everyone's understanding of services and expertise available in the community and provides an opportunity for creative problem solving and resource development.

A good case staffing brings the right people to the table to identify the needs and suggest or supply the resources to meet those needs. For more information regarding good cause/NCS case staffings, please refer to section 3.6.1 Entering Sanction.

### 3.5.6 Case Staffing - Step-by-step guide

1. The WFPS/WFSSS:
  1. Determines the type of case staffing needed (all cases, specified type of cases or a difficult case) ~~and then;~~
  2. Invites the appropriate case staffing attendees; and
  3. Prepares copies of the IRP/case demographics for the staffing.
2. The case staffing group:
  1. Identifies, prioritizes and determines who will meet each ~~person's~~ participant's need;
  2. Increases emphasis on work/work activities as other issues are resolved;
  3. Creates short-term and long-term goals, with plans to meet each; and
  4. Establishes and documents in eJAS time frames for results or review of the IRP.
3. ~~After the case staffing, the~~ WFPS/WFSSS:
  1. Makes the agreed upon referrals, updates the IRP and ~~NSA-EA~~ plan as needed;
  2. Authorizes needed support services; and
  2. ~~Documents:~~
  3. Documents
    - The attendees,
    - Circumstances of the case,
    - Case staffing results including issues, strengths, EA plans and any steps necessary to address issues,
    - When doing NCS case staffing, an explanation of the decision whether or not to pursue sanction/NCS using the NCS eJAS tool. Please refer to section 3.6.1 Entering Sanction for more information.

~~the attendees, the review of the circumstances of the case, the case staffing results including identified issues, strengths, EA plans and any action steps necessary to address issues in the case staffing section in eJAS. All required activities resulting from the case staffing must also~~

~~be documented in the IRP. Case Staffing screens are considered special records (highly protected) for DSHS only (See guide below).~~

~~Note: s information from a good cause/NCS case staffing using the NCS eJAS tool. Please refer to section 3.6.1 Entering Sanction for more information.~~ It is critical that you invite the Children's Administration (CA) Social Service Specialist to the good cause/NCS case staffing if the family is involved with CA.

Note: Case Staffing screens are considered special records (highly protected) for DSHS-only (See guide below).

~~In addition to the eJAS Case Staffing documentation, you must include the following information:~~

- ~~• Document that all available information was reviewed and discussed with one or more professionals, and~~
- ~~• An explanation of the decision whether or not to pursue sanction / NCS.~~

~~It is critical that you invite the Children's Administration (CA) Social Service Specialist to the good cause/NCS case staffing if the family is involved with CA. Try to re-engage the person back into appropriate WorkFirst activities.~~

## eJAS Case Staffing Step-by-Step Guide

1. Log into eJAS, enter the ~~client's~~ participant's JAS ID number and from the main menu, click on the "Case Staffing/~~extension Analysis~~Extension Review" link. Once the Case Staffing page, click on the "~~Click Here to Create Case Staffing Event~~Create Case Staffing" link.
2. Case Data Tab:
  - **Staffing Date:** Enter the date. To display the calendar help screen, click the icon beside the staffing date entry box.
  - **Component IRP:** To display the active components and IRP screen, click this button.
  - **Referral:** To create and send a referral, click this button.
  - **Completed Date:** Complete this box ONLY when you have fully finished the ~~c~~Case ~~s~~Staffing. Once completed you can not modify this Case Staffing event anymore.
3. Attendees Tab:
  - Enter a minimum of two Case Staffing attendee's names in the boxes provided. A minimum of two professionals are **required** to conduct the case staffing, the assigned worker (WFPS/WFSSS) counts as one professional.
4. Issues/Notes Tab:
  - Click "Create New Notes."
  - On the Create Notes page, select the issues prior to documentation

- Click "Begin Notes."
  - Enter your notes on the text box.
  - Click "Continue with Note List" to go to the next issue or go back to Case Staffing.
5. Case Staffing Result Letter:
- Select the Case Staffing Result Letter and customize the letter to reflect the results of the case staffing. Print the letter and give/send the person-participant a copy of the letter. If necessary, translate the Case Staffing Result Letter into the appropriate language and send translated document to DMS.
6. Saving:
- Clicking from one tab to another will save the entries for the previous tab.
  - To save a Case Staffing entry as complete, you need to enter a date and select the appropriate case staffing event type(s)
    - Sanction
    - 60 month
    - Exempt
    - Other

## 3.6.1 Entering Sanction

# Non-Compliance Sanction (NCS) Policy

Revised ~~4/1006/xx~~ 08/01/2017

*Legal References:*

- [RCW 74.08.090; 74.08A.260 & .270](#)
- [WAC 388-310-1600](#)

The *Non-compliance Sanction Policy* section is divided in three separate sub-sections:

- Section 3.6.1 - *Entering Sanction* describes how to make the sanction decision. This section includes:
  - [3.6.1.1](#) What is the non-compliance sanction policy?
  - [3.6.1.2](#) What are sanctions?
  - [3.6.1.3](#) How long do sanction reductions last?
  - [3.6.1.4](#) When do I send a good cause appointment/NCS case staffing letter?
  - [3.6.1.5](#) What is the good cause 10-day period?
  - [3.6.1.6](#) How do I set up the good cause/NCS case staffing?
  - [3.6.1.7](#) How do I set up the home visit (or alternative meeting)?

- 3.6.1.8 What if the post office returns the participant~~parent's mail is returned by the post office?~~
- 3.6.1.9 What happens at the good cause/NCS case staffing?
- 3.6.1.10 How do I decide if the parent-participant has good cause?
- 3.6.1.11 What if I determine the parent-participant doesn't have good cause?
- 3.6.1.12 What if the parent-participant fails to attend the good cause/NCS case staffing?
- 3.6.1.13 What is the NCS case staffing documentation standard?
- 3.6.1.14 What do I do after the NCS case staffing?
- 3.6.1.15 What if no contact is made with the parent-participant at the home visit (or alternative location meeting)?
- 3.6.1.16 What happens at the home visit (or alternative meeting)?
- 3.6.1.17 What if the supervisor disagrees with the recommendation for sanction/sanction penalty?
- 3.6.1.18 When do I send the adverse action notice?
- 3.6.1.19 eJAS/ACES Codes
- 3.6.1.20 Entering Sanction - Step-by-Step Guide
- **Section 3.6.2 - *Ending Sanction*** describes what happens after a person-participant is sanctioned and if they decide to stay in sanction for two months.
- **Section 3.6.3 - *NCS Reapplications*** describes how to process reapplications
- **Section 3.6.4 - *Permanent TANF Disqualification*** describes why and how a participant~~person~~ ~~can be~~becomes permanently disqualified from receiving TANF/SFA.

## 3.6.1 Entering Sanction

### 3.6.1.1 What is the Non-compliance Sanction policy?

The non-compliance sanction (NCS) policy ~~terminates TANF cash assistance~~ when adults participants refuse to do their part to actively prepare for and seek employment, or otherwise participate, for two months in a row. We ~~do not~~don't require dependent teens to participate and ~~do not~~don't sanction them for failure to participate.

The non-compliance sanction policy also ~~terminates TANF cash assistance~~ when mandatory WorkFirst adults-participants fail to attend a non-compliance case staffing and we ~~are not~~aren't able to make contact with them at the subsequent home/alternative site visit.

The ultimate goal of the NCS policy is to re-engage WorkFirst families currently in sanction status and to encourage them to take full advantage of the opportunities offered by the program. Sanction ~~is not~~isn't a punishment, but instead it is a tool to promote personal accountability and responsibility.

The policy ~~is designed to provide~~ numerous opportunities for ~~participant-the parent~~(s) to re-engage in appropriate WorkFirst activities and address any barriers to participation. For best results, staff should intervene early and take any opportunity to contact the ~~participantspeople~~ who are in non-compliance with their WorkFirst requirements.

### 3.6.1.2 What are sanctions?

A sanction is a penalty that reduces or terminates ~~the a~~ family's -TANF cash assistance. We impose a sanction penalty when a ~~person-participant~~ is able, but refuses without good cause to:

- Provide information needed to develop the Individual Responsibility Plan (IRP), including completing any required Comprehensive Evaluation(s),
- Show up for scheduled appointments with the people who provide WorkFirst services and follow participation and attendance rules,
- Sign the IRP,
- ~~Participant in~~ Do IRP activities, or
- Accept a job (that meets the criteria in [WAC 388-310-1500](#)).

If we discover a ~~person-participant~~ is unable to participate in the activities in the IRP, we may:

- Revise the IRP to an appropriate activity;
- Defer; ~~or~~
- Exempt the person from participation.

There are two types of sanction penalties:

- Sanction reduction penalty: we reduce the family's TANF cash assistance by the ~~person's~~ participant's share, or 40%, whichever is more, when the ~~participantparent~~ doesn't have good cause and attends their NCS case staffing or home visit.
- Sanction case closure penalty: We terminate TANF cash assistance when the ~~parent-participant~~ doesn't have good cause and fails to attend their NCS case staffing and home visit.

### 3.6.1.3 How long do sanction reductions last?

~~M~~~~We count m~~ months of sanction count because ~~adults-participants~~ who stay in sanction for two months in a row without good cause may lose their cash assistance. ~~TANF recipients who are in sanction on November 1, 2014 and whose current grant reduction started before that date may stay in sanction for four months in a row before losing their cash assistance.~~

If a sanctioned ~~participantperson receiving a reduced grant~~ exits -TANF-cash assistance for a reason other than NCS termination, and then reapplies for TANF ~~and the case is reopened after November 1, 2014~~, the sanction count will resume:

- In month one of sanction if TANF closed after sanction was approved but before the month benefits were scheduled to be reduced.
- In month two of sanction if TANF closed while the participant was receiving a reduced grant due to sanction.

For example, a participant's sanction was approved on 8/15/16, the sanctioned grant scheduled for 9/1/2016. This participant's TANF terminated 8/31/16 for no Eligibility Review (ER). If the participant reapplies for TANF, they will return in month one of sanction. If this same participant closed 9/30/16 for no ER after receiving a sanctioned grant, they would return in month two of sanction. ~~WorkFirst cash assistance case is closed effective October 2013, while in the second month of a four month sanction. If the person reapplies any time after November 1, 2014, he or she will be in month two of sanction if the case is reopened, unless they are unable to participate. Please refer to~~ *How might changes in circumstances changes a person's grant, IRP or cure requirements?*

### 3.6.1.4 When do I send a good cause appointment/NCS case staffing letter?

When a ~~person~~ participant is not participating as required, the WFPS/SSS will receive an immediate notification from the service provider. When this occurs, the WFPS/SSS does a Continuous Activity Planning (CAP) staffing with the provider, and if the provider refers the participant ~~parent is referred~~ back to the CSO, determines whether or not they ~~the parent~~ had a good reason for not participating. (See [3.9.1.5 How do we treat excused and unexcused absences step-by-step.](#))

**WAC 388-310-1600(2)** states ~~parents~~ participants have 10 days to contact us when they don't meet WorkFirst requirements so they can talk to us about the situation. ~~Parents-Participants~~ can contact us in writing, by phone, by going to the appointment described in their good cause letter, or by asking for a different appointment time. It also states we must always send a good cause letter and give the ~~parent~~ participant 10 calendar days to provide information about why there may "good cause" for not complying. This ensures:

- We meet policy and legal requirements,
- We involve M ~~more than one person is involved~~ in making the sanction decision, and
- The participant ~~parent~~ has an opportunity to bring someone with them to their good cause/NCS case staffing appointment.

WFPS/SSS must follow A ~~all of the steps of the good cause process must be followed~~, even if you are able to reach the ~~person~~ participant by phone to discuss the situation. You need to complete a thorough review of the case and document that you conducted the review ~~has been conducted~~ and that the ~~participant~~ person had the opportunity to explain the non-participation.

If a ~~person-participant~~ calls or comes in prior to the scheduled good cause appointment and wants to participate – you have two choices:

- Cancel the good cause appointment, complete a new IRP and pursue sanction if they fail to comply with the new IRP; or
- Conduct a good cause determination right then (if they waive their ~~10-10~~-day notice) following established guidelines, sanction as appropriate, and use the new IRP as the start of the ~~person's~~ participant's cure.

If the parent ~~does not~~doesn't wish to waive their 10-day notice, attempt to re-engage them at the scheduled good cause/NCS case staffing.

If you give a ~~parent-participant~~ less than 10 calendar days to establish good cause or make the good cause determination over the phone without sending a letter, the case ~~is not~~isn't procedurally correct and the sanction is invalid.

### 3.6.1.5 What is the good cause 10-day period?

In counting the 10 days, day 1 begins when we mail or give the "good cause" letter to the participant. This is the same as how we count the 10-day period for adverse action notices. Allow for an additional business day when the letter isn't mailed out the same day that it generates (either locally or centrally printed in Olympia). If the 10th day falls on a weekend or holiday, the participant has until the following business day to provide the information requested.

Document in eJAS how you sent the letter to the participant (in-person delivery, locally mailed, or centrally printed/mailed).

The following scenarios are examples of how to count the 10-day good cause period. All scenarios assume that today's date is 8/4/2010:

#### *Day 1 is 8/4/10 and Day 10 is 8/13/10*

- You locally print and hand the good cause letter to the participant in the office. The date on the letter is 8/4/10. Document in eJAS that you handed the participant the letter on 8/4/10.
- You locally print and place the good cause letter in outgoing CSO mail before the afternoon local mail cutoff. The date on the letter is 8/4/10. Document in eJAS that you locally mailed the letter on 8/4/10 before the afternoon cutoff.

#### *Day 1 is 8/4/10 and Day 10 is 8/16/10*

- You locally print and place the good cause letter in outgoing CSO mail after the afternoon local mail cutoff. The letter will go out the next business day. The date on the letter is 8/4/10. Since 8/14/10 falls on a weekend, the participant has until the end of the next business day (8/16/10) to provide good cause.

- You choose central print to mail the good cause letter to the participant. The letter will go out the next business day. The date on the letter is 8/4/10. Since 8/14/10 falls on a weekend, the participant has until the end of the next business day (8/16/10) to provide good cause.

### 3.6.1.6 How do I set up the good cause/NCS case staffing?

The first step is to set up a good cause appointment/NCS case staffing with the participant to find out if there is a good reason for not participating. Mail a good cause (*WorkFirst Non-Participation* 085-01) appointment letter to the participant, with the appointment date as close to the 10<sup>th</sup> day as possible while allowing for 10-day notice. Also schedule the participant's home visit (or alternative meeting) in case the participant doesn't attend the scheduled non-compliance case staffing in the space provided in this letter.

Arrange for the good cause/NCS case staffing in compliance with any limited-English proficiency (LEP) and Equal Access (EA) plans to communicate effectively with the non-participating parent/caregiver.

Conduct an NCS case staffing during the good cause appointment to decide whether to initiate a sanction for refusal to participate without good cause. Follow the procedures in section [3.5 Case Staffing](#) to set up the staffing. Document any information the participant provides about the non-participation (phone calls or documents) before the case staffing occurs.

Include the following people in the case staffing:

- The non-participating parent/caregiver (if they show up for the good cause appointment).
- Anyone the non-participating parent/caregiver brings with them.
- Two other relevant professionals, such as a Social Service Specialist or applicable persons from other agencies involved with the participant, which may include tribal representatives, WorkFirst partners, family violence advocates, or LEP pathway providers.
- Children's Administration (CA) staff if they currently work/recently worked with the family. Incorporate supported activities CA may require the families to do like counseling or treatment into the IRP. CA staff can help re-engage the participant into moving towards a more positive direction. Document that you checked to see whether there was CA involvement and if so, they received an invitation.

Make sure that a minimum of two professionals attend the case staffing. Remember that the assigned worker (WFPS or WFSSS) counts as one professional. In no case can a case manager be the only one making a decision to sanction.

### 3.6.1.7 How do I set up the home visit (or alternative meeting)?

The WFPS or SFSSS:



- ~~Schedule the~~ home visit (or alternative meeting) ~~must be scheduled~~ for a time no more than seven days after the noncompliance case staffing, but may be the same day~~could be scheduled for the same day. We~~.
- Schedules the two meetings at least one day apart if it is an alternative meeting instead of a home visit, and both meetings are at the CSO.
- ~~Notifies~~notify the participant parent of the date, time and location of the home visit (or alternative meeting) in the good cause (WorkFirst Non-Participation 085-01) appointment letter discussed in 3.6.1.6.
- ~~We also e~~Explains in the 085-01 that the WFPS or WFSSS shows for a home visit (or alternative meeting) ~~will only be attempted~~ if the participant parent doesn't~~does not~~ attend the noncompliance case staffing.

Note: Please see 6.5.12 for more information about what to include in letters to a participant in the Address Confidentiality Program (ACP).

The address for the home visit ~~will be~~is the participant parent's residential address. In some circumstances, an alternate location (and an alternative meeting) may be advisable. If ~~a home visit cannot be completed due to a parent's~~ participant's homelessness or ~~an in-home visit would be unsafe~~safety for the family or the case manager prevents the completion of a home visit, the WFPS/SSS may complete the alternative location meeting ~~could be completed~~ at the CSO or at an alternate location. The WFPS/SSS must clearly document ~~The~~ the reason for using an alternative location meeting ~~should be clearly documented~~ in eJAS sanction case notes. Make sure any meeting at an alternative location is easily accessible for the parent participant. It should be as close to the parent's participant's home as possible. Only use the CSO when it is the best or only option for the participant parent.

### 3.6.1.8 What if the post office returns the parent's participant's mail is returned by the post office?

Returned mail may prevent us from putting participants parents into sanction status. For example, if a parent participant's mailed IRP is returned~~returns~~, they ~~would~~ have good cause for failure to participate because they ~~did not~~didn't know ~~what was~~the requirement. We also ~~cannot~~can't place a participant parent into sanction if the postal service returns their good cause interview appointment letter ~~is returned by the post office~~ because they have a right to attend those case staffings.

However, once we make the sanction decision ~~is made~~, per [WAC 388-458-0025](#) and [388-310-1600\(4\)](#), we are only obligated to send out a 10-day change in benefits letter. There are no provisions to lift sanction/reinstate full benefits if the post office returns the change in benefits letter ~~is returned by the post office~~.

In these cases, the grant will likely ~~be closed~~ for loss of contact. If the participant parent reapplies, staff should reissue the adverse action notice and open the case in sanction.

### 3.6.1.9 What happens at the good cause/NCS case staffing?

There are two stages at the NCS case staffing. First, determine if the ~~participant~~parent has good cause for failure to meet WorkFirst requirements. Second, if you determine the ~~parent~~participant doesn't have good cause, use the eJAS Non-Compliance Case Staffing & Review Criteria tool to determine the next appropriate step for the ~~m~~parent.

As you conduct the case staffing, comply with any LEP and EA plans so you can communicate as effectively as possible with the non-participating ~~parent/caregiver~~person. Use the case staffing guidelines established under [3.5.1 What is a Case Staffing?](#)

Once you have made the decision, document issues discussed and the results of the case staffing. Explain why the department determined good cause or decided to sanction, using the NCS Case Staffing Documentation Standard. You must also send the ~~parent~~participant a case staffing results letter.

### 3.6.1.10 How do I decide if the ~~parent~~participant has good cause?

Our goal is to involve ~~participant~~people in WorkFirst activities to increase their family's ability to earn a living and provide support for their children, not to place them in sanction status. It is very important to determine and document whether a ~~person~~participant is refusing, or unable to comply. If a ~~person~~participant is unable to comply and tells us why, then we can work more effectively with ~~that person~~them and their and his or her family.

We need to be particularly careful not to place ~~participants~~people in sanction status who ~~do not~~don't comply because they ~~do not~~don't have affordable or appropriate child care, and don't know what help is available. There is a special brochure ([WorkFirst Opportunities Brochure DSHS 22-1125](#)) that you can use to give basic Child Care information to all persons who face sanction.

Anyone who ~~is not~~isn't fully participating as required has good cause if ~~they are unable to do the required WorkFirst activities, or if~~ there are significant barriers outside of their control that prevent full participation. ~~Some p~~Problems to review with every participant that may prevent compliance, ~~and that should be reviewed with every individual before being placed in sanction may~~ include having:

- An unmet need for Equal Access services (EA).
- Limited-English proficiency (LEP), not addressed through interpreters or translations that result in the ~~person~~participant not understanding ~~what is required~~WorkFirst requirements.
- An emergent or severe medical condition (verified by health care professional) of the ~~person~~participant or a family member in the participant's care~~they care for~~.
- Mental health or chemical dependency issues.
- Family violence.

- Immediate legal concerns.

Don't consider ~~Non-participation due to unexcused absences will not be considered~~ good cause unless there is a significant circumstance outside of the ~~person's~~ participant's control, such as family violence or hospitalization that made it impossible for the ~~participant~~ person to call in to get the absence excused.

If you don't have enough information to make a good cause decision, give the non-participating ~~person~~ parent/caregiver a written request for any needed additional proof. For example, if the ~~participant~~ person reports a new barrier, it is critical to give/send ~~them~~ the person a letter requesting documentation or verification of the barrier. ~~Do not~~ Don't send a recommendation to impose a sanction until a you make a decision ~~has been made~~ based on the verification provided.

If we find the ~~parent~~ participant had good cause for failure to participate in ~~his or her~~ their assigned activities, document the decision in eJAS sanction case notes using the NCS documentation standard. Determination of good cause requires a change in the IRP to reflect the appropriate activities and level of services the person needs to successfully participate in the program and may require:

- A comprehensive evaluation;
- Modified participation requirements and/or support services and a new IRP;
- A deferral from a specific activity or an exemption.

Note: PRISM is a useful tool to identify potential issues that prevent participation; however, use of PRISM to gather information for purposes of imposing sanctions for failure to follow through with requirements is prohibited.

### 3.6.1.11 What if I determine the ~~parent~~ participant ~~did~~ not ~~doesn't~~ have good cause?

If you determine the ~~person~~ participant ~~did not~~ doesn't have good cause for failure to participate, complete the eJAS Non-Compliance Sanction Case Staffing & Review Criteria tool (NCS eJAS tool).

The purpose of the NCS eJAS tool is to document that we followed the sanction process ~~was followed, gave the~~ person ~~participant was given~~ every opportunity to participate, and reviewed the case with others and agreed ~~that others have reviewed the case and agree~~ with any ~~the~~ sanction decision. It also helps you determine the next appropriate step based on all available information. The ~~participant~~ person could be placed in sanction reduction, sanction termination, or be re-engaged.

In addition, if the ~~the person~~ participant attends their NCS case staffing, go over the following as you go through the NCS case staffing & review tool:

- Discuss how participation will help them and their family.
- Make sure the person-participant has an opportunity to participate, which may include:
  - Changing IRP requirements if different WorkFirst activities will help the person-participant move towards independence and employment sooner.
  - Providing support services the person-participant needs to participate.
- Describe the sanction penalties, what happens if a person-participant stays in sanction and how to end the sanction.
- Explain that continued refusal to participate without good cause, may result in a decision to close the cash grant once the person-participant has been in sanction status for two months in a row;
- Explain that if a person-participant has three NCS case closures, they will ~~be~~ permanently ~~disqualified-disqualify~~ from receiving TANF/SFA, and that their entire family will be ineligible for TANF/SFA as long as the disqualified participantperson lives in the home;
- Explore how the person-participant plans to care for and support their children (this is called the Child Safety Review) if their case ~~is closed~~ closes, including local resources that may help meet their needs;
- Explain to the non-participating person-parent/caregiver that they may be able to receive CEAP if the supervisor or designee approves their case for closure (see [Section 3.6.3.2](#))
- Document issues discussed and the results of the case staffing in the NCS eJAS tool, using the NCS Case Staffing Documentation Standard.

### 3.6.1.12 What if the person-participant fails to attend the good cause appointment/NCS case staffing?

If the ~~person fails to attend~~ participant fails to attend the good cause appointment/NCS case staffing:

- Determine whether the person-participant was able to participate (in the required activities as outlined in the IRP) during the sanction case staffing based on whatever information is available (such as case notes, information from other professionals and medical records).
- Document issues discussed and the results of the case staffing in the NCS eJAS tool, using the NCS Case Staffing Documentation Standard
- Use the Case Staffing Result Letter to document that they waived the opportunity to attend and to describe the outcome of the staffing.
- If the case staffing results in a finding of no good cause, attempt to contact the person-participant via the scheduled home visit or alternative meeting-.
- Mail the person-participant information about resources the family may need if their TANF grant is closed.- This qualifies as the Child Safety Review if the person does not show up for their NCS case staffing.

### 3.6.1.13 What is the NCS case staffing documentation standard?

In addition to any eJAS Case Staffing documentation, the WFPS/WFSSS who conducted the staffing you must include document the following information:

- Document that you reviewed and discussed all available information, including strengths and barriers, was reviewed and discussed with one or more professionals,
- ~~Document that strengths and barriers were reviewed and discussed,~~
- An explanation of the decision whether or not to pursue sanction.
- ~~Document that~~ That you provided a sanctioned parent participant was provided with information about resources they may need if their case ~~is closed~~ closes.

### 3.6.1.14 What do I do after the NCS case staffing?

After the NCS case staffing, send the case staffing result letter explaining:

- What the participant person failed to originally ~~comply with~~ do.
- The results of the NCS case staffing.
- ~~Any~~ Recommendations to impose sanction as appropriate.
- The date and time of the scheduled home visit/alternative meeting (if the parent participant ~~didn't~~ not attend the staffing and good cause ~~was not~~ wasn't found).

If the participant parent attended the staffing, and good cause ~~was not~~ wasn't found, the -WFPS or WFSSS sends a sanction/sanction penalty recommendation to the supervisor or designee for approval. If the supervisor approves sanction/sanction penalty ~~is approved~~, the WFPS or WFSSS applies the reduced grant sanction and sends an adverse action notice.

If the parent participant ~~did not~~ didn't attend the staffing, the WFPS or WFSSS will attempt to contact them ~~parent~~ parent at the previously scheduled home visit (or alternative meeting). If the participant parent contacts you before the home visit occurs, ~~it is fine to~~ you may treat this as an alternative meeting and complete the home visit in the office or over the phone. Document when and where the meeting occurred in the NCS tool.

### 3.6.1.15 What happens at the home visit (or alternative meeting)?

The WFPS or WFSSS ~~will~~ attempts to contact the participant parent at the date, time and address specified on the 085-01 for the home visit (or alternative meeting).

If contact is made with the parent participant at the home visit (or alternative meeting), the ~~case manager~~ WFPS/WFSSS will explain to them ~~parent~~ parent that good cause ~~wasn't~~ not found at the noncompliance case staffing and that they ~~parent~~ parent will be referred for a reduced grant sanction unless it is determined that they have good cause.

If the ~~parent participant~~ is willing to discuss the case, the ~~case manager~~ WFPS/WFSSS ~~will~~ uses the NCS Home Visit Summary form to take the actions below. If the ~~participant parent~~ doesn't ~~not~~ have good cause, when the ~~case manager~~ WFPS/WFSSS returns to the office, they ~~will~~ enter this information into eJAS and send the NCS Home Visit Summary to DMS stamped "completed".

Note: Be sure to document any reason for delay.

- Review the good cause decision with the ~~parent~~ participant.
- Discuss how participation will help their family.
- Make sure the ~~person~~ participant has an opportunity to participate, which may include:
  - Changing IRP requirements if different WorkFirst activities will help the ~~person~~ participant move towards independence and employment sooner.
  - Providing support services the ~~participant person~~ needs to participate.
- Describe the sanction penalties; ~~;~~ what happens if a ~~person~~ participant stays in sanction and how to end the sanction.
- Explain that continued refusal to participate without good cause, may result in a decision to close the TANF cash grant once the ~~person~~ participant has been in sanction status for two months in a row;
- Explain that if a ~~participant person~~ has three NCS case closures, they will be permanently disqualified from receiving TANF/SFA, and that their entire family will be ineligible for TANF/SFA as long as the disqualified ~~participant person~~ lives in the home;
- Explore how the ~~participant person~~ plans to care for and support their children (this is called the Child Safety Review) if their case is closed, including local resources that may help meet their needs;
- Explain to the sanctioned ~~participant person~~ that they may be able to receive CEAP if the supervisor or designee approves their case for closure (see Section 3.6.3.2);
- Offer to start the sanction cure if the ~~participant parent~~ has decided to reengage in WorkFirst activities by completing the sanction reengagement portion of the CE and the IRP. Staff can use the NCS Home Visit Summary form to document client CE responses and the IRP activities if they don't have access to eJAS during the home visit, and then document the results in eJAS and mail the IRP to the client when they return to the office.
- Schedule an in-person CE at the CSO if the participant chooses to engage and needs a new CE.

If contact is made with the ~~parent participant~~ at the home visit (or alternative meeting), and there is no reason to change the good cause decision, the WFPS/~~or~~ WFSSS ~~will~~ recommends sanction reduction and termination after two months of sanction. If the supervisor/designee approves the sanction and subsequent termination is approved, the WFPS/~~or~~ WFSSS applies the reduced grant sanction and sends an adverse action notice.

~~If~~ The WFPS/WFSSS closes out the NCS eJAS tool, updates the IRP and re-engages the parent in appropriate WorkFirst activities if they determine good cause is determined at the home visit (or

alternative meeting), ~~the case manager will close out the NCS eJAS tool, update the IRP and re-engage the parent in appropriate WorkFirst activities.~~

### 3.6.1.16 What if no contact is made with the participant parent at the home visit (or alternative location meeting)?

The WFPS/~~or~~ WFSSS documents in the NCS eJAS tool the reason that contact was n't ~~not~~ possible and sends any ~~sanction/sanction~~ penalty recommendation to the supervisor or designee for approval. The WFPS/WFSSS applies the sanction case closure penalty (without a reduced grant period) and sends an adverse action termination notice when ~~If the supervisor/designee approves the sanction/sanction penalty. penalty is approved, the WFPS or WFSSS applies the sanction case closure penalty (without a reduced grant period) and sends an adverse action termination notice. If the home visit/alternative meeting needs to be rescheduled, the WFPS/WFSSS will send a new 85-01, allowing adequate mailing time.~~

The WFPS/WFSSS:

- Documents the reason under #15 in the Sanction Review tool if you reschedule the home visit/alternative meeting
- Documents under the appropriate confidential note if you reschedule the home visit due to an unsafe location
- Sends an 85-01 with the new home visit date/time and location (if applicable), allowing adequate mailing time

**Note:** Contact, defined as a conversation about the sanction/termination between the sanctioned client participant and a WFPS/~~or~~ WFSSS, either in person or by phone, must be made before the reinstating TANF/SFA can be reinstated. A voicemail, receipt of an application, or some other message doesn't ~~not~~ qualify as contact. Contact with anyone other than WF staff won't ~~ill not~~ qualify for the purpose of reinstatement.

A WFPS/WFSSS takes the following steps if contact has been made happens after completing an approval of a sanction case closure penalty has been approved and sending the notice of a proposed termination notice has been sent, but prior to the effective date of termination, a WFPS will take the following steps:

- Remove the NCS termination so it will not ~~won't~~ count as one of the three NCS case closures that would ~~leads~~ to permanent disqualification;
- Determine whether to open the TANF grant effective the beginning of the month using the reinstate function, without requiring participation for the 4 week cure period. ~~first.~~ You won't reinstate the case when the participant person received 10-day notice of case closure for sanction and for another reason, unless they person ~~resolves~~ the other reason for case closure prior to termination, and;

- Determine whether to code the sanction grant reduction penalty so the month after the proposed termination will be month one of a two-month reduced grant sanction. You won't code a sanction grant reduction penalty when the ~~participant~~person is unable to participate.
- The WFPS/WFSSS must offer the ~~participant~~parent an opportunity to reengage in WorkFirst, just as would have been done had they ~~parent~~ been available at the home visit.

**Example:**

Amber did ~~not~~'t attend her NCS staffing March 19 and was ~~not~~'t available for her home visit March 22. Sanction was approved, and her TANF termination would be effective April 30.

On March 31, a WFPS returns a call and speaks with Amber. No evidence is provided that would reverse the good cause decision made at the staffing and Amber is currently able to participate.

The WFPS:

- Reinstates TANF as of May 1,
- Removes the NCS termination,
- Codes the sanction reduction penalty. May will be month one of a two-month reduced grant sanction, and
- Offers Amber an opportunity to reengage in WorkFirst and start her sanction cure.

If the ~~parent~~participant is willing to engage in WorkFirst, complete a [reengagement interview](#) including the REIN tool and Part Four of the CE.

Note: The original NCS tool would have been completed when the proposed termination notice was sent.

If the ~~parent~~participant is not willing to engage in WorkFirst, track the sanction in the CLMR by completing the first two questions in the REIN tool, using the date of the reinstatement letter in the field for the approval letter date.

### 3.6.1.17 What if the supervisor disagrees with the recommendation for sanction/sanction penalty?

When a ~~participant~~person is referred for sanction, the supervisor/designee will review the NCS eJAS tool to determine whether the sanction policy and process was correctly followed.

The supervisor/designee may deny the sanction/sanction penalty recommendation due to:



- Inadequate or untimely notice for the good cause/NCS case staffing appointment
- Case staffing done incorrectly (such as one ~~person~~ participant did the staffing and made the decision)
- CA involvement, but failed to invite CA
- Failure to do a Child Safety Review (or send out material to no-shows)

The supervisor/designee may also deny the sanction/sanction penalty recommendation when the ~~person~~ participant:

- Didn't know what their IRP required
- Was sanctioned for an activity not in their IRP
- Had unaddressed barriers to participation
- Reported a barrier and we failed to respond
- Had good cause for failure to participate

A denial will send the case back to the case manager to review and correct. The case manager can make necessary corrections and send the case back for a decision or close out the tool when the sanction or case staffing was invalid.

### 3.6.1.18 When do I send an adverse action notice?

The department cannot sanction ~~parents~~ participants until a 10 day notice of adverse action is sent to the client. The earliest date you can make the sanction decision and send out the adverse action notice depends on whether the parent contacts you within the 10-day good cause period. If the ~~participant~~ parent does not show up for his or her NCS case staffing, do not send the notice until after you have attempted the follow up home visit/alternative meeting.

- **Contact from ~~parent~~ participant within the 10 days good cause period:** When ~~participant~~ parents contact us to tell us they will not participate or do not have a good cause anytime during the 10-day period, the notice of adverse action can be issued. The department does not have to wait until the 10th day to issue the adverse action notice. Document the contact and the ~~participant~~ parent's statements in eJAS.
- **Incomplete information from ~~participant~~ parent within the 10 days:** When a ~~participant~~ parent provides some information but not everything needed to make a good cause determination, the department must inform the ~~participant~~ parent in writing what else is needed and allow a reasonable amount of additional time to respond. A reasonable amount of time is not necessarily 10 days. This second request does not make the first good cause letter invalid. Send an updated good cause letter with the date this information is due.
- **No contact within the 10-days:** When a ~~participant~~ parent does not respond at all and does not attend the scheduled good cause meeting, the department must wait until the 10th day to send

the adverse action notice. However, if the ~~parent~~participant contacts you and establishes good cause by the end of the 10th day, you must rescind the adverse action letter.

- **Simultaneous notice of non-participation and intent to not participate:** A ~~parent~~participant may tell you that ~~she or he does~~they do not intend to participate at the same time you find out that ~~she or he has~~they have not been participating. When this occurs, hand the ~~parent~~participant a good cause letter or mail the letter. See 3.6.1.4, When do I send a good cause appointment/NCS case staffing letter? for more information.
- The adverse action letter addressed to head of household must specify the name of the ~~participant~~person in the household who is being placed in sanction.
  - This applies for both one and two parent households.

WAC 388-310-1600(5) states once we decide that a ~~parent~~participant did not have a good reason for failing to meet WorkFirst requirements, we must tell ~~them~~the parent what ~~they~~he or she failed to do. This must be added to the ~~participant~~parent's adverse action notice. We must tell the ~~participant~~parent how to cure their sanction.

The ~~participant~~parent needs to know what specific activity in the Individual Responsibility Plan they did not follow through with. This is particularly important when there is more than one activity. We must state who did not do the ~~activity~~activity as there may be more than one mandatory participant in the family.

To summarize, include the following information in the adverse action letter:

- Who is being placed in sanction (specific ~~person~~participant)
- What they failed to do (specific activity in IRP)
- That the specific ~~participant~~person is in sanction status
- The penalties that will be applied to the grant
- When the penalties will be applied
- Administrative hearing rights
- How to end the penalties and get out of sanction status

Please note that on the 08-01 Change in Benefits letter staff only need to enter the information corresponding to the first three bullets. The rest of the information is automatically printed on the letter. However, on the 06-02 Termination of TANF/SFA letter for those receiving the case closure sanction penalty, staff must enter the information corresponding to the first three bullets and also add the following text, including appropriate dates:

- The penalty for this sanction is case closure because you did not attend your staffing appointment scheduled on \_\_\_\_\_ and you were not available for your home visit or alternative meeting scheduled on \_\_\_\_\_.
- If your case is closed, you will need to reapply and may need to follow your IRP for 4 weeks in a row before you can receive a grant.

- If your case is closed 3 or more times, you may be permanently disqualified from receiving TANF/SFA.

If these points are not met in the notice of adverse action, then the requirements have not been met and the family cannot be placed in sanction status.

### 3.6.1.19 eJAS/ACES codes

When someone is sanctioned, use the following ACES and eJAS codes:

- **SA** (eJAS code indicating the person is in sanction).
- **IC** (eJAS code showing that a component has been closed incomplete)
- **RE** (ACES WORK screen sanction code for households 60 months or less on WorkFirst cash assistance)
- **SN** (eJAS sanction code for households 61 or more months on WorkFirst cash assistance)

### 3.6.1.20 Sanctions - Step-by-step guide

Note: The NCS process and automated supports track each specific incidence of non-participation. If you consider sanction again based on another incidence of non-participation, you must conduct new appointments and create a separate NCS eJAS tool.

#### A. Setting up the good cause/NCS case staffing appointment

The WFPS or WFSSS identifies ~~persons-participants~~ who aren't complying with program requirements and s:

Sends the ~~person-participant~~ the WorkFirst Non-Participation Appointment letter (085-01) scheduling a good cause/NCS Case Staffing appointment within 10 calendar days to find out if there is good cause for noncompliance.

The WFPS/WFSS: :

1. Addresses the letter to the non-participating parent/caregiver.
2. Specifies in the body of the letter who is in noncompliance.
3. Adds the required text explaining what the ~~participanparent~~ failed to do. You can be vague such as “You didn’t meet with your provider on [date] at the scheduled time [time].”
4. Tells them they can choose to bring anyone they want to the appointment.
5. Adds the following text to the letter regarding the case staffing and who has been invited to attend. “At this appointment, we will also be reviewing your participation in the WorkFirst program with other involved agency staff. I have invited (list agency staff) to this appointment.”

6. Adds the date, time and location of the home visit (or alternative meeting) that will be attempted if the ~~parent participant~~ does ~~not~~'t attend the good cause/NCS Case Staffing appointment.
- ~~0.7.~~ Closes affected component code(s) with IC and contractor code(s) with actual ending date.
- ~~0.8.~~ Enters PR component code in eJAS with a scheduled end date that coincides with the good cause appointment date, not to exceed 14 calendar days.
- ~~0.9.~~ Invites at least two other relevant professionals, such as a social service specialist or someone from another agency who is working with ~~the person~~ the participant, to the good cause/NCS case staffing appointment. A minimum of two professionals is required with the assigned worker (WFPS or WFSSS) counting as one professional.
- ~~0.10.~~ \_\_\_\_\_ Documents that we determined whether Children's Administration (CA) was involved with the family, and if so, that CA was invited to the good cause/NCS case staffing appointment.

## **B. Conducting the good cause/NCS case staffing interview**

At the good cause/NCS case staffing appointment, with appropriate professionals, the WFPS/WFSSS:

1. Determines whether good cause exists by:
  - a. Reviewing available information and determining if activities were appropriate.
  - b. Discussing program requirements with the ~~parent participant~~ and what they failed to do.
  - c. Discussing strengths and barriers with the ~~parent participant~~.
2. If the person doesn't have good cause:
  - a. Ensures the ~~participant person~~ was given 10 days to contact the office and establish good cause.
  - b. Explains why the department is recommending sanction.
  - c. Explains that the ~~person participant~~ can be permanently disqualified from receiving TANF/SFA once they have been closed for NCS three times, going back to March 1, 2007.
  - d. Ensures the ~~participant person~~ knows how many NCS closures they have had.
  - e. Offers re-engagement.
  - f. Completes or schedules the Sanction Reengagement CE interview and modifies the IRP, as required, based on the CE outcome, the ~~person participant~~ agrees to participate
  - g. Conducts a Child Safety review to help the ~~participant person~~ plan for case closure, including:
    - i. How the ~~participant person~~ plans to support their family once they lose cash aid.
    - ii. Explaining the possible continuation of Washington Apple Health and Basic Food Assistance.

- iii. Providing a list of community resources (like WIC) that are available to help meet the family's need.
  - iv. Explaining that they may be able to apply for CEAP at reapplication if the case is closed for non-compliance sanction.
3. If the ~~participant~~~~person~~ doesn't attend, bases the decision on all available information, such as case notes or medical records.
  4. Closes the PR component code.

Note: PRISM is a useful tool to identify potential issues that prevent participation; however, use of PRISM to gather information for purposes of imposing sanctions for failure to follow through with requirements is prohibited.

### C. Processing good cause determinations

1. When it is determined the ~~person~~~~participant~~ has good cause, the WFPS/WFSSS:
  1. Enters the appropriate codes for the required activities.
  2. Adjusts the IRP.
  3. Makes appropriate referrals.
  4. Authorizes support services as needed.
  5. Documents the decision in eJAS sanction case notes using the NCS documentation standard.
2. When it is determined the ~~person~~~~participant~~ doesn't have good cause, the WFPS/WFSSS:
  1. Completes the NCS eJAS tool questions 1 through 15, using the NCS documentation standard, and refers to the supervisor or designee for approval.
  2. Sends the case staffing results letter with required text from the Sanction Letters and Documentation Resource including:
    1. Who attended the good cause/NCS case staffing,
    2. What the ~~participant~~~~person~~ failed to comply with originally,
    3. The results of the NCS staffing,
    4. A reminder of the scheduled home visit (or alternative meeting) if the ~~participant~~~~parent didn't~~ didn't show up for the noncompliance case staffing, and
    5. Any recommendation to impose sanction.
  3. Mails a local resource list if the ~~participant~~~~individual~~ doesn't show up for the case staffing (which counts as a Child Safety Review).
  4. Completes question 15 on the NCS eJAS tool if the ~~participant~~~~parent~~ does show up for the noncompliance case staffing, and refers to the supervisor or designee for approval of a sanction/sanction penalty.
  5. Monitors the NCS Review Pathway report in the Caseload Management Report (CLMR) for supervisor/designee decision if a referral to supervisor was done.

6. Enters PR component code in eJAS with a scheduled end date that coincides with the home visit/alternative meeting appointment date.

#### **D. Conducting the home visit (or alternative meeting)**

When the ~~participantparent~~ no shows for the noncompliance case staffing and no good cause was found, the WFPS/~~WFSSS~~ will attempt to make contact with the ~~participanparent~~ at the date, time and address specified on the 085-01 for the home visit (or alternative meeting).

1. If contact is made with the ~~participantparent~~ at the home visit (or alternative meeting), the WFPS/~~WFSSS~~ will:
  - a. Reviews the good cause decision.
  - b. Uses the NCS Home Visit Summary form to cover the other topics required during good cause case staffings and offer to start a sanction cure. You can access this form on the CSD WF SharePoint Sanction Documents page. Document this discussion and send a copy of the completed form to be scanned into the client's Electronic Case Record (ECR) in Barcode as 'completed' after transferring the information to eJAS and sending the client the new IRP (if a new plan was agreed upon).
  - c. Completes questions 15 and 16 on the NCS eJAS tool, and refer to the supervisor or designee for sanction/sanction penalty approval.
  - d. Monitors the NCS Review Pathway report in the Caseload Management Report (CLMR) for supervisor/designee decision.
2. If contact isn't made with the ~~participantparent~~, the WFPS/~~WFSSS~~ will:
  - a. Documents why contact wasn't possible in the NCS eJAS tool.
  - b. Completes question 15 and 16 on the NCS eJAS tool, and refer to the supervisor or designee for sanction/sanction penalty approval. If approved, the case will close without a grant reduction.

#### **E. Processing Sanction Decisions**

1. The CSO Supervisor/designee routinely monitors the Clients Awaiting Sanction/Term Approval report in eJAS for ~~participantsindividuals~~ newly referred for sanction. When a ~~participantperson~~ is referred for sanction, the supervisor/designee will:
  1. Reviews the NCS eJAS tool questions 1 through 15 (and 16 on home visit cases) to ensure:
    - a. Policy was followed.
    - b. Entries are accurate.
    - c. Documentation is complete.
    - d. There is no issue with returned mail, such as the IRP, eJAS appointment letters, or the good cause appointment letter (85-01).
  2. Completes question 16 (or 17 for home visit cases) of the NCS eJAS tool to document the sanction/sanction penalty decision.

- a. A denial returns the document (monitored through the NCS Review Pathway report) to the WFPS/WFSSS for further action. The WFPS/WFSSS can either modify the NCS Review Criteria and resend it to the supervisor/designee for review, or complete the review by clicking the ‘Complete’ button.
  - b. An approval approves sanction and the penalty.
  - c. Entry of brief additional comments is optional.
2. The WFPS/WFSSS can monitor the decision of the supervisor/designee on the NCS Review Pathway report. Once a decision has been made, the WFPS/WFSSS ~~will~~:
  1. If the case is returned for rework, make the necessary corrections and resubmit to the supervisor/designee.
  2. If the sanction/sanction penalty is denied:
    - a. Completes the NCS eJAS tool, and
    - b. Schedules/contacts the participant~~person~~ for IRP development.
  3. If the sanction/sanction penalty is approved:
    - a. Processess the sanction in ACES and eJAS,
    - b. Actively attemptss monthly follow-up and re-engagement contacts with the sanctioned person until their case is closed, to discuss the benefits of participation and explain how to cure sanction.

#### F. ACES/3G Processing for Approved Sanctions

1. If the supervisor or designee approves the sanction reduction penalty, the WFPS/SW ~~will~~:
  - a. Change the Participation Status on the sanctioned individuals Work Registration screen to Refused – Mandatory Participant (RE). The effective date will auto populate to the first of the following month, allowing for advance notice.
  - b. Send the adverse action notice, Change in Benefits (08-01) allowing for 10 day advanced notice and adding required text:
    - i. Who is being placed in sanction (specific person~~participant~~).
    - ii. What they failed to do (specific activity in IRP unless the activity is confidential).
    - iii. That the specific participant~~person~~ is in sanction status.
    - iv. The penalties that will be applied to the grant.
    - v. When the penalties will be applied.
    - vi. Administrative hearing rights.
    - vii. How to end the penalties and get out of sanction status.

**Note:** ~~Please note that s~~Staff only need to enter the information corresponding to ~~the first three~~ bullets i-iii. The rest of the information is automatically printed on the letter.

2. If the supervisor or designee approves the sanction case closure penalty, the WFPS/WFSSS ~~will~~:

1. Leaves the Mandatory Participant (MP) code on the sanctioned individual's Work Registration screen;
2. Checks the box on the Work Registration screen for "Closed while in Non-Compliance Sanction", and;
3. Sends the adverse action notice, Termination of TANF/SFA (06-02) allowing for 10 day advanced notice and adding the required text:
  1. Who is being placed in sanction (specific ~~person~~participant),
  2. What they failed to do (specific activity in IRP unless the activity is confidential),
  3. That the specific ~~person~~participant is in sanction status, and
  4. Add the following text including appropriate dates;
    - The penalty for this sanction is case closure because you didn't attend your staffing appointment scheduled on \_\_\_\_\_ and you weren't available for your home visit or alternative meeting scheduled on \_\_\_\_\_.
    - If your case is closed, you will need to reapply and may need to follow your IRP for 4 weeks in a row before you can receive a grant.
    - If your case is closed 3 or more times, you may be permanently disqualified from receiving TANF/SFA.

**Note:** ~~Please note that a~~Administrative hearing rights are automatically printed on the letter.

### G. eJAS Processing for Approved Sanction/Sanction Penalties

The WFPS/~~WFSSS~~ ~~will:~~

1. Denies any support services being received until the participant ~~person~~ starts curing the sanction.
2. Depending on how long the participant~~person~~ has been on WorkFirst cash assistance, enter the SA or SN component through the end of month 1 of the sanction reduction penalty or through the end of the month after the paid through date of the sanction case closure penalty and update the codes in monthly increments for the sanction reduction penalty.
3. Completes NCS eJAS tool question about the adverse action letter:
  - a. Enters the Change in Benefits letter (08-01) or the Termination of TANF/SFA letter (06-02) date.
  - b. Enters the sanction effective date.
  - c. Selects one sanction reason.

## Resources

### Related WorkFirst Handbook Chapters



- [3.1 Tools - Overview](#)
- [3.2 Comprehensive Evaluation](#)
- [3.5 Case Staffing](#)
- [6.1 Resolving issues](#)

## Forms & Other Resources

- [EA-Z Manual - Food Stamp E & T Chapter](#)
- [WorkFirst Opportunities Brochure \(DSHS 22-1125\)](#)
- [2-Month Sanction: Non-Compliance Sanction Case Staffing and Review Criteria Reference Guide](#)
- [4-Month Sanction: Non-Compliance Sanction Case Staffing and Review Criteria Reference Guide](#)

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### 3.6.3 Non-Compliance Sanction Re-applications

Created on:  
Feb 20 2015

#### Tools

Revised ~~6/30/2016~~ 8/1/2017

*Legal References:*

- *RCW 74.08.090; 74.08A.260 & .270*
- *WAC 388-310-1600*

The *Non-Compliance Sanction Policy* section is divided in three separate sub-sections:

- **Section 3.6.1 - *Entering Sanction*** describes how to make the sanction decision.
- **Section 3.6.2 - *Entering Sanction*** describes what happens if a ~~person-participant~~ decides to stay in sanction for more than three months. This section includes:
- **Section 3.6.3 - *NCS Reapplications*** describes how to process reapplications from non-compliance sanction case closures. This section includes:
  - **3.6.3.1** Can a ~~participant~~ person reapply for TANF cash assistance after non-compliance sanction case closure?
  - **3.6.3.2** What is a WorkFirst Sanction Reopen (WFSR) case?
  - **3.6.3.3** Consolidated Emergency Assistance Program (CEAP) for non-compliance case closures for non-compliance sanction.
  - **3.6.3.4** What if a ~~person-participant~~ reapplies before their case is closed?

- 3.6.3.5 How do I decide and track an applicant's participation requirements?
- 3.6.3.6 What if the ~~person-participant~~ stops participating?
- 3.6.3.7 How is the application approved?
- 3.6.3.8 What if a ~~participant~~~~person~~ is reopened and they ~~person~~ stops participating again?
- 3.6.3.9 NCS reapplication - step-by-step guide
- Section 3.6.4– *Permanent TANF Disqualification* describes why and how a ~~person-participant~~ can be permanently disqualified from receiving TANF/SFA.

## 3.6.3 Non-Compliance Sanction Reapplications

### 3.6.3.1 Can a ~~person-participant~~ reapply for TANF cash assistance after non-compliance sanction case closure?

~~Yes~~– A ~~person-participant~~ may reapply for TANF cash assistance or State Family Assistance by filing a new application. Unless it is a WorkFirst Sanction Reopen case, ~~he or she~~~~they~~ will need to participate ~~for~~ 4 weeks in a row before they get cash.

Note: The sanctioned family may be eligible for CEAP while they meet the participation requirement (see [Section 3.6.3.3](#)).

If a ~~person-participant~~ has ~~had~~ three NCS case closures, they ~~will be~~~~are~~ permanently disqualified from receiving TANF/SFA benefits. If a ~~person-participant~~ with three or more NCS closures reapplies for TANF/SFA, ~~deny~~ their application ~~will be~~~~denied~~. Please refer to [section 3.6.4](#) – Permanent TANF Disqualification.

### 3.6.3.2 What is a WorkFirst Sanction Reopen (WFSR) case?

A WorkFirst Sanction Reopen (WFSR) case is when ~~a~~ ~~person-participant~~ ~~has~~ ~~received~~ a sanction case closure penalty, applies for TANF, and completes a financial interview by the end of the month following the paid through date.

For example, if a ~~person-participant~~ received the sanction case closure penalty with a 2/28 paid through ~~date~~, and they reapply and complete their financial interview in March, process the application as a WFSR case. ~~In this scenario, an application received prior to 3/1 isn't a WFSR case yet because TANF is still open. If the application is received prior to 3/1, it is an open TANF case and is not yet a WFSR case.~~

Refer to the CSD Procedures Handbook, 'Processing a WFSR Red Application', to process a WFSR case. To summarize, the WFPS ~~will~~:

1. Removes the NCS termination so it ~~will not~~~~won't~~ count as one of the three NCS case closures that would lead to permanent disqualification;

2. Determines whether to open the TANF grant effective the beginning of the month using the reopen function, without requiring participation for the ~~4-week~~4-week cure period first. ~~You won't~~Don't reopen the case when the ~~person-participant~~ received 10-day notice of case closure for sanction **and** for another reason; unless the ~~person-participant~~ resolves the other reason for case closure when they reapply. ~~and;~~
3. Determines whether to code the sanction grant reduction penalty so the month of application will be month one of a two-month reduced grant sanction. ~~You won't~~Don't code a sanction grant reduction penalty when the ~~person-participant~~ is unable to participate.

Use the text blocks below for WFSR approval and denial letters. You can access the text blocks at the CSD WorkFirst SharePoint Sanction Documents page.

Text Block	Used For
WFSR reopened in sanction	Approval letter when the WFSR case closed for NCS only and the client is able to participate
WFSR reopened without sanction	Approval letter when the WFSR case closed for NCS only and the client is NOT able to participate
Ineligible WFSR—remains in sanction status	Denial letter when the WFSR case closed for NCS and another reason and the client is able to participate. If the client later reappplies and is found eligible, they will reopen in sanction status.
Ineligible WFSR – no longer in sanction status	Denial letter when the WFSR case closed for NCS and another reason and client is NOT able to participate. If the client later reappplies and is found eligible, they will NOT reopen in sanction status.

**Example #1 (WFSR reopens in sanction)**

A ~~client-participant~~ fails to attend his scheduled non-compliance staffing appointment at the office on 07/10 and is not available for his scheduled home visit on 07/15. ~~so He~~ receives the sanction case closure penalty and his TANF grant is terminated for non-compliance sanction on 07/31. His case is closed for NCS only.

On 08/20, he submits an application for TANF and he completes a financial interview on 8/28. ~~so~~ this is a WFSR case. The WFPS determines that he is able to participate.

The WFPS removes the NCS termination and opens TANF, and follows the CSD Procedures Handbook to open as of 08/01 in month one of sanction. The WFPS uses the 'WFSR reopened in sanction' text block on the approval letter

The client does not cure or end his sanction by the end of September, so the WFPS imposes the NCS case closure effective 09/30.

**Example #2 (WFSR reopened without sanction)**

Same scenario as example #1 except the WFPS determines the client is no longer able to participate due to a recent verified back injury. The WFPS:

Removes the NCS termination and documents that the client is unable to participate and is no longer in sanction status.

Reopens the case as of 8/1 and uses the ‘WFSR reopened without sanction’ text block on the approval letter.

**Example #3 (ineligible WFSR – remains in sanction status)**

Same scenario as example #1 except the client received 10-day notice for both NCS case closure and for having no eligible child.

On 8/28, when he completes a financial interview, the WFPS determines that there is still no eligible child in the household and the client is able to participate.

The WFPS removes the NCS termination and keeps the case closed as the ~~person-participant~~ has already received 10-day notice of case closure due to no eligible child. The WFPS uses the ‘ineligible WFSR – remains in sanction status’ text block on the denial letter.

The client reapplies three months later, the child has returned home, and he is financially eligible and able to participate. The WFPS reopens the case in month one of sanction. The client does not need to cure the sanction before we reopen the case because he met the WFSR criteria on 8/28.

**Example #4 (ineligible WFSR – no longer in sanction status)**

Same scenario as example #1 except the ~~participant-client~~ received 10-day notice for both NCS case closure and for having no eligible child and is NOT able to participate.

On 8/28, when he completes a financial interview, the WFPS determines that there is still no eligible child in the household and the client is no longer able to participate due to a serious chemical dependency issue.

The WFPS removes the NCS termination and keeps the case closed as the ~~person-participant~~ has already received 10-day notice of case closure due to no eligible child.

The WFPS documents that the ~~client-participant~~ is unable to participate and is no longer in sanction status.

The WFPS uses the ‘ineligible WFSR – no longer in sanction status’ text block on the denial letter. If the ~~client-participant~~ later reapplies and is reopened, he will not reopen in sanction.

### 3.6.3.3 Consolidated Emergency Assistance Program (CEAP) for non-compliance sanction case closures.

~~Persons-Participants~~ closed for non-compliance sanction (NCS) may qualify for CEAP. They are eligible to apply for CEAP under the same rules as other applicants.

To determine eligibility and authorize benefits follow the CEAP eligibility and procedures described under WAC 388-436-0015.

### 3.6.3.4 What if a ~~person-participant~~ reapplies before their case is closed?

If the case ~~was~~ closed due to a sanction case closure penalty and contact is made ~~with the client~~, see [WFHB 3.6.1.16](#) for definition of contact and instructions on reinstating TANF/SFA.

If the case ~~was~~ closed due to a sanction case closure penalty and **no** contact is made ~~with the client~~, the application is a WFSR application as of the first of the month. (~~For staff use: See CSD Procedure Handbook~~[CSD Procedure Handbook](#), Processing TANF/SFA Application Forms Received Prior to Case Closure Penalty.)

#### Example:

Greg's TANF is closing November 30 due to sanction case closure penalty. He submits an online application form on November 25. The case manager attempts contact, but Greg ~~does not~~doesn't speak with WF staff before November ends. As of December 1, the application form becomes a WFSR application and staff can't reinstate TANF ~~cannot be reinstated~~.

If TANF/SFA is closing after two months of the grant reduction sanction penalty and ~~we receive~~ an application is received before the NCS termination date:

- Track the application in DMS, and
- Attempt to contact the ~~parent-participant~~ right away.

Note: ~~The worker will not~~Staff won't be able to input the application into ACES until the first of the following month.

After the ~~parent-participant has completed~~ completes an interview and staff determines financial eligibility ~~has been determined~~, the WorkFirst Program Specialist (WFPS) or WorkFirst Social Service Specialist (WFSSS) will determines if ~~the person is~~they are able to participate.

- If the ~~person-participant cannot~~can't participate, lifts the sanction and restores full benefits the first of the following month.
- If the ~~person-participant~~ can participate, manually tracks participation until the 1st of the following month. After the 1st of the month, tracks participation ~~can be tracked~~ in eJAS.

### 3.6.3.5 How ~~are do I decide and track~~ an applicant's participation requirements determined and tracked?

When ~~an application is filed~~ a client applies after the NCS termination, the intake worker:

- ~~Decides~~ Determines financial eligibility.
- Pends application approval for WorkFirst participation.
- Refers the case to WorkFirst staff to find out whether the ~~person~~ participant is required to ~~must~~ participate before they receive cash.

Once that decision is made, the WFPS/~~WFSSS~~ ~~or SSS will~~ lets the intake worker know so they can update the application pend letter as needed. Once the ~~person~~ participant is in pending status, they ~~will~~ appear on the 'NCS Re-applicant report' on the Caseload Management Report. Only the ~~person~~ participant who caused the termination ~~will~~ appears on the report.

The person must participate, if able, ~~for~~ four weeks in a row (28 consecutive days) before they ~~will~~ be eligible for cash benefits.

- Waive a person's the 4-week participation requirement (and remove the SA or SN code) when ~~the participant enters~~ they enter the third trimester of pregnancy if they:
  - Have completed a Pregnancy to Employment assessment and;
  - ~~a~~ Are not Don't have a mental health and/or chemical dependency treatment requirement ~~to participate in mental health and/or chemical dependency treatment.~~

Waive ~~The~~ requirement ~~can also be waived~~ if their situation is now severe enough that they are exempt.

- The participant starts over with zero months in sanction when you waive ~~Once the participation requirement is waived, the person participant starts over with zero months in sanction.~~
- Tell-Notify the application intake worker if you lift the participation requirement so they can update the pend letter or approve the application.

If the ~~person~~ participant is able to participate, ~~the WFPS/WFSSS will:~~

- Tracks the ~~person's~~ participation in eJAS.
- Schedules the ~~person~~ participant for a Sanction Re-engagement Comprehensive Evaluation (CE) interview. The Sanction Re-engagement CE interview must be done in addition to the short-term, mid-term or long-term returner comprehensive evaluation for re-applicants. ~~It is not~~ isn't necessary to complete the last question (screening for other issues) of the Sanction Re-engagement CE interview.
- Develops the ~~person's~~ participant's IRP and set up necessary supports, such as WCCC and transportation, ~~the person needs~~ needed to participate.

- ~~Tell the application intake worker of the estimated date the person will complete participation.~~

If both parents in a 2-parent household ~~were refusing~~refused to participate and caused their case to be closed, both parents ~~will~~ need to meet the 28-day participation requirement. Don't approve ~~the~~ application ~~will not be approved~~ until both parents meet this requirement.

Day one of participation begins when the person-participant completes the Sanction Re-engagement CE interview and IRP. Excused absences count towards meeting the 28-day requirement. ~~You can also~~ Credit any uninterrupted participation in month 2 up to the end of the month towards meeting the 4-week participation requirement.

The WFPS/WFSSS must complete:

- ~~complete a~~ A comprehensive evaluation ~~must be done~~ every time a person-participant reapplies for benefits. In addition,
- ~~complete a~~ A Sanction Re-engagement CE interview ~~must be done~~ for applicants who are re-entering TANF in sanction.

After the CE and Sanction Re-engagement CE interview is completed, ~~the person must be referred~~refer the participant to other approved activities until the full 4 weeks of participation is completed.

~~Tell the application intake worker when the four week participation requirement is met. WorkFirst cash assistance~~ TANF benefits start on the date the person-participant meets all other eligibility factors.

### 3.6.3.6 What if the person-participant stops participating?

~~When you are told that~~ an applicant has stopped participating, ~~tell the intake worker so they can~~ deny the application. Tell the applicant to contact WorkFirst staff if they want a reconsideration of the denied application. The WFPS/~~or~~ WFSSS determines whether ~~finds out if~~ there was a good reason for interrupting participation.

Good reason may be granted if the person-participant is determined unable to perform the required WorkFirst activities or if ~~there are~~ significant barriers outside their control ~~which~~ prevented participation as described under [WAC 388-310-1600\(3\)](#). ~~Issues that may be considered~~ Good reason that may be considered includeare:

- An unmet need for Necessary Supplemental Accommodation (NSA)
- Limited-English Proficiency (LEP) not addressed through interpreters or translations that result in the person-participant not understanding what is required
- Emergent or severe medical condition (verified by a health care professional) of the person-participant or a family member in their care
- Family Violence
- Immediate legal concerns

Non-participation because of unexcused absences ~~will not be~~ not considered good reason unless there is a significant circumstance outside the person's-participant's control (such as family violence or hospitalization). This circumstance must make it impossible for the person-participant to call in to show a good reason for stopping the 4-week participation.

~~If the WFPS/-or-WFSSS decides good reason exists, the excused days will count towards the participant's cure period. the request is approved and the person will be allowed to continue their participation where it left off.~~ For example, a person-participant stops participating on March 7<sup>th</sup>, which is the 6th day of the 28-day period. On March 12th, it is determined that good reason exists and the person-participant will start to participate again on March 15th. March 15th is now day 14-7 of participation of the 28-day period. ~~The person must participate 4 weeks (28 days) regardless of the time it took to show good reason.~~

~~If the WFPS/When you approve good reason, tell the application intake worker so they can rescreen the application, re-pend the case and apply Standard of Promptness (SOP) coding if applicable.~~

~~If the WFPS/WF-or-SSS decides good reason does not doesn't exist, the WFPS denies the application and request is denied. Tell the application intake worker so they can take action. The denial stands and the intake worker will send the denial letter with free form text. sSends the denial letter with required free-form text.~~

~~If the WFPS/WF-or-SSS decides that no participation is required and grants the person-participant meets an exemption criteria, tell the application intake worker. The intake worker will rescreen and approve the application if no further financial items are required to determine eligibility otherwise determined eligible.~~

### 3.6.3.7 How is the application approved?

~~Tell the application intake worker w~~When the applicant meets the participation requirement, and remove the SA or SN code from eJAS. ~~The intake worker and~~ approves the application back to the date financial eligibility was met.

Follow the approval instructions in the CSD procedures handbook, for WFSR cases.

### 3.6.3.8 What if a person-participant is reopened and they person stops participating again?

Follow the sanction or NCS process; the person-participant will have two months to complete four weeks of participation or the case ~~may be closed~~ will close again for NCS.

After following the sanction guidelines of [section 3.6.1- Entering Sanction](#) the WFPS/~~or~~-WFSSS must:



- Schedule the sanctioned person-participant to go through the Sanction Re-engagement comprehensive evaluation interview.
- Continue to try to reengage the sanctioned person-participant.

### 3.6.3.9 NCS Reapplication - Step-by-step guide

#### Non-WFSR Step-by-Step

The intake application worker refers applicants to WorkFirst who have been closed for non-compliance sanction to meet a 4-week WorkFirst participation requirement. Once the person-participant is in pending status, they ~~will~~ appear on the 'NCS Re-applicant report' on the Caseload Management Report. Only the person-participant who caused the termination ~~will~~ appear on the report.

~~Once the referral is received, t~~The WFPS ~~or~~ WFSSS:

1. Decides if the person-participant is able to participate.
  1. If the person-participant ~~cannot~~ can't participate, they ~~tell the intake application worker so the application can be~~ pend the application for financial eligibility or approve ~~d~~.
  2. If the person-participant reapplies before the NCS termination effective date and ~~cannot~~ can't participate, ~~notify the intake worker,~~ lift the sanction and restore the grant effective the first of the following month per 3.6.1.10.
  3. If the person-participant can participate, the WFPS/~~SSS or~~ WFSSS:
    1. Schedules a CE.
    2. Develops an IRP.
    3. Approves needed supports.
    4. Tracks participation.
    5. ~~Tells the intake worker the estimated date the person will complete participation.~~
2. Decides if there is good reason if the person-participant stops participating as required ~~and tells the intake worker of the results.~~ If the person-participant:
  1. Is no longer able to participate, they will only need to meet financial eligibility criteria.
  2. Has good reason, they will pick up participation where it left off until the 28-day requirement is met.
  3. ~~Does not~~Doesn't have good reason, the application denial will stand.
3. ~~Removes the SA or SN code. Adjusts eJAS~~ once all participation and financial eligibility criteria are met ~~by removing the SA or SN code.~~

#### WFSR Step-by-Step

~~The intake worker follows~~Follow the procedures in the CSD procedures manual to reopen the case, and ~~then refers~~refer sanctioned recipients to meet a 4-week WorkFirst participation requirement, as needed, to cure their sanction. Once TANF is ~~reopened~~reopens, the WFPS ~~or~~ WFSSS:

1. Opens the REIN on the eJAS NCS tool menu:
  1. Selects the date of the approval letter from ACES letter history,
  2. Completes the questions in the REIN tool.
2. If the participant~~client~~ is unable to participate:
  1. Completes the 'When Sanction is Cured or Lifted' section of the REIN tool; and,
  2. Removes the SA or SN code.
3. If the ~~person~~-participant is able and willing to participate:
  1. Completes or schedules the Sanction Reengagement CE interview,
  2. Develops an IRP.
  3. Approves needed supports.
  4. Tracks participation.

## Resources

### Related WorkFirst Handbook Sections

- [3.1 Tools - Overview](#)
- [3.2 Comprehensive Evaluation](#)
- [3.5 Case Staffing](#)
- [6.1 Resolving issues](#)

### Forms & Other Resources

- [EA-Z Manual - Food Stamp E & T Chapter](#)
- [WorkFirst Opportunities Brochure \(DSHS 22-1125\)](#)