

## Sanction Desk Guide

If Non-Compliant with Work Requirement	Then CAO Action will be
<p>If the CAO learns of an individual's non-compliance when:</p> <ul style="list-style-type: none"> <li>• Contractor rejects the referral or terminates the enrollment in CWDS - or</li> <li>• Individual is referred to participate in the CAO-directed activity and non-compliance becomes known to CAO</li> </ul>	<ul style="list-style-type: none"> <li>• Attempt to contact the individual within three days</li> <li>• Discuss the non-compliance</li> <li>• Update eCIS with a Project Code A and GC code 45 with a 30 day alert review</li> <li>• Narrate</li> </ul>
<p>If the caseworker is unable to reach the individual by telephone or if the client does not have a telephone</p>	<ul style="list-style-type: none"> <li>• Check if domestic violence (DV) has been disclosed, if not                             <ul style="list-style-type: none"> <li>○ Send the PA 1706 (Compliance Review Appointment notice; When an alternate address is provided, mail both PA1706 and PA1747.2 (Domestic Violence Individual Notice)</li> </ul> </li> <li>• Send the PA 1706 within 10 days of discovered non-compliance. It must include: caseworker name, address, alternate contact name and the telephone number of both caseworker and alternate contact</li> <li>• Compliance review may be face-to-face or by telephone</li> </ul>
Compliance Review	CAO Action
<p>Conducted either by telephone or face-to-face</p>	<ul style="list-style-type: none"> <li>• Determine if client had good cause, exemption or willful non-compliance</li> <li>• Enter the appropriate exemption or good cause code</li> <li>• If good cause is determined, update the AMR and send client to the appropriate activity or control for a Partial when good cause circumstance is resolved</li> </ul>

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	<ul style="list-style-type: none"> <li>• Data enter the referral to the ETP project enrollment in eCIS</li> <li>• Narrate</li> </ul>
If the individual does not attend or participate in the compliance review and no good cause or exemption exists	<ul style="list-style-type: none"> <li>• Then determine the level of sanction if the individual in the budget group is determined to be willfully non-compliant <ul style="list-style-type: none"> <li>○ Mail a manual PA 162A with the appropriate A.1, A.2 or A.3 attachment</li> </ul> </li> </ul>
<b>Good cause may exist if individual is</b>	<b>Exemptions may include</b>
<ul style="list-style-type: none"> <li>• Disabled or are caring for a household member with a disability</li> <li>• Receiving mental health treatment or drug and alcohol counseling</li> <li>• Victim of domestic violence</li> <li>• Homeless, facing eviction or utility shutoff</li> <li>• Previous or current MPP involvement</li> <li>• Unable to arrange or locate transportation</li> <li>• Unable to arrange child care or a lack of child care verified by Child Care Information Services (CCIS)</li> </ul>	<ul style="list-style-type: none"> <li>• A verified physical or mental disability determined by a physician, nurse practitioner, a physician's assistant or licensed psychologist</li> <li>• A physician may verify a disabled child or incapacitated adult needs in the home care and no one else is able to provide this care</li> <li>• A single custodial parent with a child under age one</li> <li>• Children under age 18 who are in school or in a GED program</li> </ul>
<b>Case Review</b>	<b>Action resulting from Case Review</b>
Includes reviewing information located in the case file, CIS and eCIS screens, narratives, imaging, and medical history profile.	The information obtained from the case review is to determine whether or not the client may have had good cause or an exemption.
If circumstances are identified, consideration of good cause or exemption, need to be evaluated.	<ul style="list-style-type: none"> <li>• Then the CAO may provide the individual with a medical form PA 635, update CQPREN with GC 53 and set Alert for 30 days</li> </ul>

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	<ul style="list-style-type: none"> <li>• Provide the individual with a caregiver form (PA1820) which identifies and determines if the caregiver exemption (ETP-54) is needed</li> <li>• Allow the individual the opportunity to verify a good cause circumstance</li> <li>• Offer the opportunity to engage in another activity</li> </ul>
<b>If Sanction</b>	<b>Then CAO Action will be</b>
<p><b>First Sanction:</b></p> <ul style="list-style-type: none"> <li>• The individual in the budget group will be sanctioned <u>for a minimum of 30 days</u> (DS-21). The first sanction continues until the individual has demonstrated and maintained compliance for at least one-week and thereafter</li> <li>• After 90 days, the individual remains sanctioned if they have not met and maintained the minimum one-week compliance requirement during that 90-day period, and the entire budget group shall become ineligible (DS-27) and remain ineligible until the individual demonstrates and maintains compliance for at least one week and thereafter, or he or she establishes good cause or an exemption</li> </ul>	<ul style="list-style-type: none"> <li>• CAO Management staff reviews the entire sanction, if approved</li> <li>• Change eligibility status code from ES to DS-21</li> <li>• Sanction continues until individual has demonstrated and maintained compliance for at least one-week and thereafter or established good cause or exemption</li> <li>• Mail the PA 1712, within 10 days prior to the end of the first 30 days sanction period</li> <li>• If at the end of a minimum 30-day sanction period, the individual is compliant by agreeing and participating in an E &amp; T activity - update the AMR with the appropriate activity</li> </ul> <p><b>If non-compliance continues:</b></p> <ul style="list-style-type: none"> <li>• On the 75<sup>th</sup> day, if individual continues to be non-compliant</li> <li>• Mail the 162A with Attachment A.4 which explains how the entire budget group will become ineligible on day 91 and remain ineligible until compliance has been met for at least one-week and thereafter, or individual establishes good cause or an exemption</li> </ul>

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	<ul style="list-style-type: none"> <li>• Change eligibility status code from DS-21 to DS-27 effective on day 91+</li> </ul>
<p><b>Second Sanction:</b></p> <ul style="list-style-type: none"> <li>• The individual in the budget group will be sanctioned <u>for a minimum of 60 days</u> (DS-22). The second sanction continues until the individual has demonstrated and maintained compliance for at least one-week and thereafter</li> <li>• After 60 days, the individual remains sanctioned if they have not met and maintained the minimum one-week compliance requirement during that 60-day period, and the entire budget group shall become ineligible (DS-28) and remain ineligible until the individual demonstrates and maintains compliance for at least one week and thereafter</li> </ul>	<ul style="list-style-type: none"> <li>• CAO Management staff reviews the entire sanction, if approved</li> <li>• Change eligibility status code from ES to DS-22</li> <li>• Sanction continues until individual has demonstrated and maintained compliance for at least one week and thereafter or established good cause or exemption</li> <li>• If at the end of a minimum 60 day sanction period, the individual <i>is compliant</i> by agreeing and participating in an E &amp; T activity</li> <li>• Update the AMR with the appropriate activity</li> </ul> <p><b>If non-compliance continues:</b></p> <ul style="list-style-type: none"> <li>• On the 45<sup>th</sup> day, if individual continues to be non-compliant</li> <li>• Mail the 162A with <b>Attachment A.4</b> which explains how the entire budget group will become ineligible on day 61 and remain ineligible until compliance has been met for at least one week and thereafter, or the individual establishes good cause or an exemption</li> <li>• Change eligibility status code from DS-22 to DS-28 on day 61+</li> </ul>

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<p><b>Third Sanction:</b></p> <ul style="list-style-type: none"> <li>• Third Sanction is final - Entire budget group is permanent ineligible</li> </ul>	<ul style="list-style-type: none"> <li>• CAO Management staff reviews entire record, if approved</li> <li>• CAO will forward sanction packet to Headquarters for final review</li> </ul> <p><b>When approved:</b></p> <ul style="list-style-type: none"> <li>• Change eligibility status code from ES to DS-29</li> <li>• Sanction is permanent ineligibility for entire budget group</li> </ul> <p><b>If proposed permanent sanction is not approved or found invalid:</b></p> <p>Headquarters will notify the CAO of necessary actions which may include:</p> <ul style="list-style-type: none"> <li>• Completion of a partial redetermination</li> <li>• Update to the AMR to reflect current activity, good cause or exemption</li> </ul>
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### Special Allowances

Special allowances (SPALs) will not be issued to individuals serving a RESET sanction.

### Following Minimum Durational Sanction

Good cause may be granted from the requirement to demonstrate and comply with work/work-related requirements for at least one-week if the individual is unable to comply due to lack of SPALs.

### PA 162A - Advance Notice

Issue a manual Advance Notice at least 15 calendar days before the effective date of the action. This 15-day period provides the client time to exercise his right of appeal and to receive continued benefits pending the hearing decision. If the 15-day period expires on a weekend or holiday and the CAO receives a request for a hearing on the next work day, benefits will continue unchanged pending the hearing decision.

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<b>Sanctions</b>	<b>Sanction Codes</b>	<b>Sanction Days</b>
1st Sanction - Individual	DS-21	30 - 90
1st Sanction after 90 days - full family	DS-27	91+
2nd Sanction - Individual	DS-22	60
2nd Sanction after 60 days - full family	DS-28	61+
3 <sup>rd</sup> Sanction	DS-29	Permanent

(Revised 9/10/2012)