Policy Clarifications - Employment & Training Policy/Procedure EPP-16649-135

Submitted:06/13 Agency: CAOs TR No. 16649 Citations:

Subject: RESET Sanction Policy for Extended TANF

ETANF policy at CAH 135.862 indicates "if an individual (adult head-of-household or spouse of head-of-household) fails to comply with Extended TANF eligibility requirements, the entire family is sanctioned."

<u>OPS120704</u> indicates elimination of Post-24 month sanction designation but does not specifically address ETANF. The ETP Sanction Desk Guide does not specifically address ETANF.

Does the CAO initially enter DS-27 or DS-28 for willfully non-compliant ETANF recipients even though DS-27 and DS-28 are designated as after 90 days/after 60 days?

Response By: Barbara Deppen Date:06/13

The changes to RESET sanction policy announced in OPS120704, effective July 1, 2012, apply to all TANF clients, including those receiving Extended TANF benefits. CAH 135.862 has been updated to eliminate the sentence you quoted and other references to former policy. We apologize for any confusion.

After the compliance review, an Extended TANF client who is willfully non-compliant and has not established good cause or met an exemption will initially serve an individual sanction. See CAH 135.72 for clarification of sanction levels and the associated time frames for when the sanction flips to full-family.

Whether a client is receiving TANF or Extended TANF benefits, the data entry requirements are the same:

First sanctions will be coded as DS-21 for at least 30 days; if after 90 days, compliance is not demonstrated and maintained, the DS code must be changed to DS-27 to affect the entire budget group.

- Second sanctions will be coded as DS-22 for at least 60 days; if after 60 days, compliance is not demonstrated and maintained, the DS code must be changed to DS-28 to affect the entire budget group.
- Third sanctions will all be coded as DS-29 to affect a permanent sanction on the entire budget group. DS-23, which had been used for pre-24 month individual sanctions, will no longer be applied after July 1, 2012. DS-23 may exist for a current pre-24 month cash assistance individual who has demonstrated and maintain compliance. Remember that a 162-A with the appropriate attachment must be sent 15 days prior to changing the first or second sanction from an individual to a full-family sanction. Use the sanction desk calculator as a guide.