

**DSS ADMINISTRATIVE LETTER NO. ECONOMIC AND FAMILY SERVICES 1-2020  
EFS\_WF\_AL-1-2020**

**Work First**

**TO:** COUNTY DIRECTORS OF SOCIAL SERVICES

**ATTENTION:** Work First Program Managers and Supervisors

**DATE:** March 23, 2020

**SUBJECT:** Work First Interview Process During a Federal or State Declared Natural Disaster or Emergency

**EFFECTIVE DATE:** Upon Receipt

**I. GENERAL INFORMATION**

On March 10, 2020, Governor Roy Cooper issued Executive Order No. 116, Declaration of a State of Emergency to Coordinate Response and Protective Actions to Prevent the Spread of COVID-19. The purpose of this letter is to provide guidance regarding the Work First interview process while operating under a Federal or State disaster or emergency declaration. The Department values the safety and well-being of county staff and the families they serve. To foster social distancing, the Division has updated the TANF State Plan to include the provision of telephone interviews for Work First applications, recertifications, short-term services and benefits.

**II. POLICY PROCEDURES**

During periods of natural disaster or other emergencies determined by the state or federal government, the required Work First screening/assessment face-to-face interview can be conducted by telephone. The Work First Cash Assistance Application and Review Documentation Workbook (DSS-8228) can be mailed to individuals who wish to apply for Work First Cash Assistance or short-term services and benefits. Upon receipt of the DSS-8228, the case managers must conduct a telephone interview with the applicant to complete the NC FAST Intelligent Evidence Gathering (IEG). Applicants must meet all eligibility requirements for ongoing Work First cash assistance or short-term benefits and services.

**III. IMPLEMENTATION PROCEDURES**

Case managers must follow the policies regarding:

- Short-term Services and Benefits Work First Manual Section 102:

Short-term services and benefits are nonrecurring services and benefits designed to deal with a specific episode of need; not intended to meet recurring or ongoing needs; and not extending beyond four months.

- Cash Assistance Application Process and Procedures Work First Manual Section 104:

The telephone interview must cover all the information required for completion of the NC FAST Intelligent Evidence Gathering (IEG). When the IEG is submitted, the system creates an Application PDF. The resulting document, which includes a signature page, is considered the application for cash assistance. The participant must sign the IEG to complete the application process. Case managers must follow the guidance in Work First Policy Manual Section 104 to preserve the date of application.

For all work-eligible applicants, a Mutual Responsibility Agreement (MRA) Plan of Action (DSS-6963B) must be developed within five (5) workdays of the date of application.

- Cash Assistance Recertification Process and Procedures Work First Manual Section 201:

Recertification interviews can be conducted by telephone. Work First recertifications must be processed within 60 calendar days prior to the last day of the current certification period.

Good cause for failure to provide required documentation, failure to comply with the MRA-A or MRA-B must be examined case by case. Good cause is defined as:

- Disability of the caretaker;
- Disability of a child or other family member requiring the caretaker to remain at home and provide care;
- Family crisis or change including, but not limited to, death of a spouse, parent, or child, and;
- Lack of necessary childcare;
- Disruption in childcare arrangements;
- Civil leave, including jury duty, or a required court appearance;
- A significant change in the participant's work schedule by the employer;
- Loss of transportation.

For employed individuals "A significant change in the participant's work schedule by the employer" can be utilized. Other activities will require strong documentation of good cause if one of the above reasons is not suitable.

Case managers must use prudent judgment to ensure that good cause is applied reasonably and equitably to all families. Documentation must be thoroughly recorded in NC FAST on the Income Support Case Details tab.

#### IV. EFFECTIVE DATE

This policy is effective upon receipt. Please email any questions regarding this policy to the DHHS Operational Support Team (OST): [DSS.Policy.Questions@dhhs.nc.gov](mailto:DSS.Policy.Questions@dhhs.nc.gov).

Sincerely,

A handwritten signature in blue ink that reads "David Locklear". The signature is written in a cursive style with a large initial "D".

David Locklear, Deputy Director  
Economic and Family Services

DL/kg