

**DSS ADMINISTRATIVE LETTER ECONOMIC AND FAMILY SERVICES 9-2020
EFS_WF_AL-9-2020 (Amended)**

Work First

TO: COUNTY DIRECTORS OF SOCIAL SERVICES
ATTENTION: Work First Program Managers and Supervisors
DATE: April 22, 2020
SUBJECT: Qualified Professional in Substance Abuse Assessment/Treatment
and Substance Use Testing Requirement
(Amended)

EFFECTIVE DATE: Upon Receipt

I. GENERAL INFORMATION

Governor Cooper's Executive Order 116, State of Emergency Declaration, includes coordinating responses and protective actions to prevent the spread of COVID-19 and increasing teleworking across the State's workforce. To comply with Executive Order 116, the Division is updating the TANF State Plan to include the provision of granting good cause when a client is unable to complete the QPSA substance use appointment or substance use testing requirements due to limitations and the unavailability of a QPSA and drug testing sites to provide the required services. This letter is being amended from the original letter issued on April 1, 2020 to update information in the Referral for QPSA or Substance Use Testing process provided in this letter regarding sanctions.

II. POLICY PROCEDURES

North Carolina General Statute 108A-29.1, requires substance use screening and testing for the illegal use of controlled substances, if there is reasonable suspicion, for each Work First Program applicant or recipient as a condition of eligibility to receive assistance.

A combination of two verbal screening questionnaires (DSS-8218), the Alcohol Use Disorders Identification Test (AUDIT) and the Drug Abuse Screening Test (DAST-10) is used for the screening. They are designed to be used together to screen for potential alcohol and substance use disorders. If the applicant/recipient screens positive for alcohol misuse, the applicant/recipient would be referred to QPSA for an assessment. If the applicant/recipient screens positive for other substances, the applicant/recipient would be referred to a testing facility for substance use testing (a urine toxicology).

Substance use screening is an integral part of the eligibility determination process and the county department of social services agencies have the responsibility to administer the substance use screening questionnaire. The required Work First Substance Use Screening can be conducted by telephone.

There are situations in which applicants/recipients are willing to comply with the requirement to be drug tested or undergo a substance use assessment but due to the COVID-19 pandemic

are unable to comply, and if indicated, are unable to participate in substance use disorder treatment as a requirement of receiving benefits. Good cause can be granted for not complying with the requirement to drug test or undergo substance use assessment and/or treatment when the QPSA or drug testing agency cannot provide the required service due to the COVID-19 pandemic.

III. IMPLEMENTATION PROCEDURES

Follow the guidance in Substance Use/Mental Health Initiative outlined in Work First Manual Section 104B to determine if a QPSA referral or substance use testing is applicable.

- **Conducting the Substance Use Screening:**
Review the Substance Use Screening Notice (DSS-8218A) with each applicant/recipient subject to the substance use screening prior to completion of the Audit/DAST-10 (DSS-8218). If the screening is completed via telephone, mail the DSS-8146A, a pre-addressed envelope and two copies of each form to the applicant/recipient; one form for the participant to keep and one to sign and return to the case manager.
- **Referral for QPSA or Substance Use Testing:**
If the QPSA or drug testing site is unable to provide the required services to the applicant/recipient due to COVID-19 pandemic, thoroughly document the case to explain the circumstances preventing the applicant/recipient from meeting the requirement. At this time, use the good cause reason “families in crisis” listed in NCFAS, however the good cause reason to be used may change later. Once the crisis has ended, a DSS-8146 giving the participant a timeframe to return requested information, must be sent to the participant requesting verification the QPSA substance referral/treatment or substance use testing requirement has been completed. If the information is not returned timely, without good cause reason, the necessary steps should be taken to **sanction** the case based on Work First Policy.

IV. EFFECTIVE DATE

This policy is effective upon receipt. All provisions implemented will be allowed until the COVID-19 public health emergency declaration by the Secretary of Health and Human Services is lifted.

Please email any questions regarding this policy to the DHHS Operational Support Team (OST): DSS.Policy.Questions@dhhs.nc.gov

Sincerely,



David Locklear, Deputy Director
Economic and Family Services

DL/lmd