



MARYLAND DEPARTMENT OF HUMAN SERVICES
 Department of Human Services
 311 West Saratoga Street
 Baltimore MD 21201

FIA ACTION TRANSMITTAL

Control Number: #24-24

Effective Date: UPON RECEIPT

Issuance Date: December 4, 2023

TO: LOCAL DEPARTMENTS OF SOCIAL SERVICES (LDSS) DIRECTORS, LDSS DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT, FAMILY INVESTMENT SUPERVISORS AND ELIGIBILITY STAFF

FROM: AUGUSTIN NTABAGANYIMANA, FIA ACTING EXECUTIVE DIRECTOR

RE: 60-MONTH HARDSHIP EXEMPTION REVIEW ALERTS AND ELIGIBILITY AND ENROLLMENT (E&E) SYSTEM ENHANCEMENTS

PROGRAM AFFECTED: TEMPORARY CASH ASSISTANCE (TCA)

ORIGINATING OFFICE: OFFICE OF PROGRAMS

SUMMARY

A Temporary Cash Assistance (TCA) hardship exemption is given to customers who have received 60 months or more of TCA benefits and have not been able to obtain or retain employment due to circumstances beyond their control. The hardship exemption must be approved by the appointed authority. When customers reach 58 countable TCA months, the case manager must interview the TCA head of household (face to face or via telephone) to assess and review the case for a possible hardship exemption. As part of the TCA case processing function, the following Eligibility and Enrollment (E&E) system enhancements have been created:

- A counter to track the number of hardship exemptions and extensions granted.
- The ability to use the 510 closure/denial code.
- Created a case manager worker alert for follow-up.

A family may be eligible for a hardship exemption or extension when:

The customer has been unable to obtain or retain employment due to circumstances beyond his or her control and despite valid attempts to do so. Examples of such circumstances include, but are not limited to:

- a. medical conditions of the customer, spouse, or other dependent household

- member;
- b. experiencing mental health or substance use issues;
 - c. homelessness or at imminent risk of homelessness;
 - d. domestic violence;
 - e. significant transportation barriers;
 - f. childcare barriers;
 - g. lack of education, skills, and job training;
and criminal history

Note: There are no changes in the TCA 60-month policy. For additional information review AT# 20-07, TCA manual section 313, and the attached E&E system How to Guide.

ACTION REQUIRED:

Add Hardship Exemption

The E&E system will generate an alert on the first day of month 58. The title of the alert is “Review Hardship”. This alert is designed to remind case managers to schedule a face-to-face or telephone interview with the TCA head of household to determine if the customer meets the criteria for a hardship exemption at month 60. A “60-Month TCA Program Review Notice” will be automatically generated and sent to the customer with information on what to expect. Case managers must:

- Send an appointment letter to the customer.
- Complete the assessment, update the Family Independence Plan (FIP), and complete form 428 (Hardship Exemption form) during the appointment. Once the hardship referral form is completed, forward it to the supervisor and /or appropriate assignee for decision.
- Enter the Case ID on the E&E Worker Portal Dashboard and click the magnifying glass icon.
- Select the Works Exemption tab from the Eligibility Determination Left-Hand Navigation Menu after the customer interview is complete.
- Update customers’ Works Exemption Screen in E&E by:
 - Entering the Begin date of the exemption
 - Choosing Cash Assistance for the Program
 - Choosing “Hardship Exemption Granted” for the Exemption Type

- Choosing “Yes” for Verification
- Enter the “End Date” of the exemption
- Click on the Save & Close button.
- Upload documents into Enterprise Content Management (ECM) .

Case managers will be redirected back to the Works Exemption screen which will now display the entered hardship information.

Review Hardship Exemption Extension Alert

The Review Hardship Exemption Extension Alert is designed to remind case managers to follow up with customers no later than 5 months after the hardship exemption/extension has been granted. The Review Hardship Exemption Extension alert will be generated on the first day of the 5th month from the date the hardship exemption was granted. Case managers must:

- Select the Changes & Alerts tab on the E&E worker portal dashboard.
- Click the eye icon to access the case.
- Select the “Review Hardship” under Pending Work Items.
- Send an appointment letter to the customer.
- Complete an assessment, update the FIP plan, and complete form 428 [Hardship Exemption form] during the appointment. Once the hardship referral form is completed, forward it to the supervisor and /or appropriate assignee for decision.
- Update customers’ Works Exemption Screen in E&E by:
 - Entering the Begin date of the exemption
 - Choosing Cash Assistance for the Program
 - Choosing “Hardship Exemption Granted” for the Exemption Type
 - Choosing “Yes” for Verification and entering the End date of the exemption.
 - Click on the Save & Close button.
- Upload documents in ECM.

Case managers will be redirected back to the Works Exemption screen which will now display the entered hardship information.

Program Time Limit Screen Enhancements

A new Time Limit Type has been added to the Program Time Limit Screen as “Hardship”. The screen will refresh and display the Hardship Exemption Counter and the details of each month the exemption was granted.

TCA Closure/Denial Codes

- If the TCA case is closing or an application is being denied because the hardship exemption was not granted /extended, the system will automatically close the case with:
 - Code 510 - Your Cash Assistance case is being closed because you have received the maximum number of TCA payments in Maryland.

TCA Reapplications

- When the customer reapplies for TCA and has received 60 months or more of TCA, the case manager must evaluate/interview the customer to determine if they are eligible for a new hardship exemption.
 - During case processing, the case manager must address the Works Exemption screen, indicate hardship exemption is given, and enter the beginning and end date. The hardship exemption must not exceed 6 months to ensure the Hardship Exemption Review alert is generated at month 5 for 60+ month Hardship Exemption review and possible extension.
 - A new Hardship Exemption form must be completed, signed, and forwarded to the supervisor and designee to determine if a hardship exemption will be granted.
 - Upload signed/approved hardship exemption form and current signed FIP in ECM and narrate.
 - Do not pay TCA for an adult parent who has received 60 months of benefits under TCA (here or in another state) unless they:
 - meet requirements for the hardship exemption, and the hardship exemption has been granted.
 - Follow procedures as directed. (See TCA manual section 313)
- Example:
 - Ms. Bubble received TCA on and off for 60 months. The hardship exemption was not granted to Ms. Bubble because she was not in compliance with her Family Independence Plan (FIP). Ms. Bubble had received her conciliation period for non-compliance with the work program and her case was reduced for failure to comply with the work requirements. Ms. Bubble received a reduced TCA payment for a little over a year. Ms. Bubble was given several opportunities to comply with the work requirements and refused. During the 60-month interview, it was determined that Ms. Bubble did not have any barriers to complying with the work requirements and she still refused to participate in the work program.

Ms. Bubble's case was closed with a 510 and the hardship exemption was not granted.

- Two years later Ms. Bubble re-applies for TCA. At application, Ms. Bubble is interviewed to determine if she qualifies for a hardship exemption. Ms. Bubble explains she was let go from her job because she lost her transportation. Her car broke down and she could not afford the cost of repairs, so she sold it to a junkyard. Based on Ms. Bubble's current circumstances the case manager is recommending a hardship exemption for Ms. Bubbles.
- The case manager further explained to Ms. Bubble if she doesn't comply with the work requirements, and everything written in her FIP, a 30-day conciliation will be given and if still non-compliant after the conciliation period, then her case will be closed with code 510 due to not meeting the requirements of a hardship.

REFERENCES:

- How-to-Guide Add Hardship Exemption for a 60-month Temporary Cash Assistance (TCA) Program
- AT 20-07
- TCA Manual Section 0313

INQUIRIES:

Please direct policy questions to FIA Policy by completing the [FIA Policy Information Request Form](#). Montgomery County staff may submit their policy questions via email at fia.policy@maryland.gov. For questions related to E&E, please email fia.bsdm@maryland.gov.

cc: DHS Executive Staff
FIA Management
Staff Constituent
Services
DHS Help Desk
Office of Administrative Hearings