P-2347 Sanctions (Con't)

P-2347A Implementing Sanctions (B23-08)

In general when starting a sanction in ACCESS, the following steps should be taken. Districts may have their own process for ensuring these steps are done.

See Reach Up procedure 2240 Sanctioned Households for basic information about Reach Up sanctions.

Sanction Authorization

Complete a Sanction Authorization (form 606) and include the following:

- Specific information about the non-engagement;
- Explanation about why the sanction will be implemented;
- Rule cite(s) relied on to make this determination; and
- The sanction meeting date.

Give the completed Sanction Authorization (606) to the Reach Up Supervisor, or their designee, for review.

Review by Supervisor

The Reach Up Supervisor, or their designee, will determine:

- What were the participant's circumstances?
- Were multiple methods of communication attempted, was the goal achievement process used to determine the participant's goal(s)?
- Was good cause explored?
- Is the paperwork complete?
- Was rule 2375.1 followed?

The sanction will be approved or reversed at this time.

Sanction reversed

If the Supervisor decides to reverse the sanction, it is recorded in the case file and e-mailed or discussed with the case manager.

Sanction approved

If the Supervisor agrees with the decision and the sanction is approved, they will sign off on the Sanction Authorization (606) on the district director/designee line. Follow your district specific process to implement the sanction.

A copy of the signed 606 should be kept in the case management file. Another copy is given to eligibility staff so they can follow through with the eligibility steps. The signed 606 should also be scanned into OnBase.

Sanction start date

Sanctions always start at the beginning of the month and always end at the end of the month.

Adverse action deadlines affect when a sanction can be imposed. Look at the current ACCESS calendar on SharePoint to find out what month the next sanction can start.

Sanction Notices

Four notices should be created and mailed to the household at least 10 days before the sanction is scheduled to begin.

The four notices include:

- Sanction Appointment letter (created through CASE C SANC);
- Reasons for Sanction letter (created in SPEC C FORMS); and
- 2 Eligibility Notices – created when sanctioned amount is approved in eligibility budget – 1st notice states the sanction is starting, 2nd notice shows the reduced benefit amount.

Whenever possible, these notices should be mailed together.

Sanction meeting with case manager

Once a sanction starts, the sanctioned participant must meet with their case manager before any of the Reach Up benefit will be released. The purpose of the meeting is to try to develop a plan for the participant to start following through with Reach Up Services requirements again and end the sanction.

Waiving the meeting

The sanction meeting may be waived for the following reasons:

- Severe illness
- Death in the family
- Other equally compelling reason justifies an exception.

Case Manager Support

Check out the Sanction Flow Chart to see the full Sanction process.

Entering the Sanction into ACCESS

Only enter the sanction into ACCESS after a supervisor, or designee, approves the sanction.

Enter CASE/C/SANC.

```
06/23/16 15:29              IV-A SELECT FUNCTION                    ASTCA1

    ~~~~   Function Codes (FNX)   ~~~~      ~~~~   Function Codes (FNX)   ~~~~
  ABWD - ABAWD Food Stamp History         MAIL - Send or Read Mail
  APPL - Application                      MANA - Managed Care Maintenance
  CASE - Case Status Display              MONY - Financial Subsystem
  CATN - Case Action Log                  NAME - User Name/Number Lookup
  CATS - Cost Allocation/Time Study       PCOL - Premium Collections_
  EDS  - Medicaid Management System       PERS - Person Search
  ELIG - Eligibility Results/Approval     PMGT - Premium MGT Report
  FIAT - Fiat Eligibility                 PREM - Premium Management
  FUEL - Supplemental Fuel                QUAL - Quality Review
  GAEL - General Assistance               RECO - Recoupment Schedule
  IDEA - System Change Request            REPT - Report Selection
  INFC - Interfaces                       SPEC - Special Functions
  INQB - Benefit History                  STAT - Statement of Need
  INQD - Benefit Disbursement History     SUBS - Substitute Reporter/Payee
  IV-D - IV-D Select Function             TODO - Daily To-Do Report
  JFIP - Jobs For Independence            UNLK - Releases Locked Cases
  LOGO - Logoff                           VEND - Vendor Search

USER:     FNX: CASE MODE: C RPTGRP: HOH SSN    PERIOD: 06 16 COMMAND: SANC
                                                             F8 = MORE
```

Always use the Head of Household Social Security Number when entering a sanction even if it is the second parent that is being sanctioned.

Place an "X" next to the participant that is sanctioned.

```
06/23/16 15:30        *** CASE SANCTIONS MENU SCREEN ***          (ASPEBH)

        Mark 'X' beside a name for full CASE/SANC panel.
        Mark 'H' to view person's Sanction History.

                                                CURRENTLY
        X RL MEMBER                          AGE SANCTIONED
        - -- -------------------------------- --- ----------
        x 01 TONYA                            25
        _
        _
        _
        _
        _
        _


        * * THE EARLIEST A NEW SANCTION CAN BEGIN IS 08/01/16 * *

    USER:     FNX: CASE MODE: C RPTGRP:        PERIOD: 06 16 COMMAND: _____
    DO:   IMS:     RPTGRP NAME: TONYA                                      3
```

Place cursor on the sanction start reason ("RSN").

```
06/23/16 15:31              *** CASE SANCTIONS SCREEN ***                 (ASPEBH)
  BPS:                                              DT LST MOD: 01 30 2014
  FSCM:                                                  MOD BY:


      SSN:                 NAME: TONYA

SANCTION START  -----MEETING WITH CASE MANAGER------   SANCTION END    FORFEIT
RSN ---DATE---  SCHED DATE  TIME   HELD DATE  WAIVER   RSN ---DATE---    RU ?
                           00 00
 _   _ _ ___    _ _ ___              _ _ ___    _       _  _ _ ___        _
                           (hh mm)
                                        ------UNFORGIVEN SANCTION HISTORY------
   ---- CURRENT SANCTION INFORMATION ----    ----START----- -----END------ FULL ACT
        HOUSING PROTECTION IN EFFECT? No     RSN    DATE    RSN    DATE     AMT AMT
   (ALREADY RCVD 6 MONTHS HSG PRO)            7   01 01 2014  C  02 01 2014  75  75
          SANCTION $ AMT APPLICABLE: 75
      MONTHS ON RU SINCE JULY 2001: 81
CONSECUTIVE MONTHS OF COMPLIANCE: 0
          TOTAL MONTHS OF SANCTIONS: 1



  USER:      FNX: CASE MODE: C RPTGRP:              PERIOD: 06 16 COMMAND: _____
  DO:   IMS:      RPTGRP NAME: TONYA                                            3
```

Hit "Shift F12" for a list of sanction reasons.

Select the appropriate sanction code.

```
06/23/16 15:31              *** CASE SANCTIONS SCREEN ***                 (ASPEBH)
  BPS:                                              DT LST MOD: 01 30 2014
  FSCM:                                                  MOD BY:

      ┌─────────────────────────────────────────────────────────────────┐
      │ START SANCTION CODES                                 ASHD32AA     │
 SANC │                                                                   │  IT
 RSN  │    1 - Adult requested Fair Hearing AFTER sanction started        │  ?
  _   │    2 - Minor Parent failed approved living                        │
      │    3 - Failed job search requirements                             │
      │    4 - Refused job or work placement                              │  ----
 ---- │    5 - Quit job or work placement                                 │  ACT
      │    6 - Dismissed from job or work placement without good cause    │  AMT
 (AL  │    7 - Failed to comply with Reach Up requirements                │  75
      │                                                                   │
      │    M - Mandatory Youth failed to comply with Reach Up             │
 CONS │    H - Mandatory Youth requested Fair Hrng AFTER sanction started │
      │                                                                   │
      │    F - Sanctions on hold: Fair Hearing requested before sanction  │
      │                           started. Use for adult or youth.        │
      │    YOUR SELECTION: _                                              │
 USER └─────────────────────────────────────────────────────────────────┘
 DO:   IMS:      RPTGRP NAME: TONYA                                            3
```

Enter the "Sanction Start Date" and the meeting with case manager "Sched Date and Time".

```
06/23/16 15:32          *** CASE SANCTIONS SCREEN ***                (ASPEBH)
  BPS:                                          DT LST MOD: 01 30 2014
  FSCM:                                              MOD BY:

      SSN:              NAME: TONYA

SANCTION START   -----MEETING WITH CASE MANAGER------    SANCTION END   FORFEIT
RSN ---DATE---    SCHED DATE  TIME   H          R   RSN ---DATE---   RU ?
  7  08 01 2016   08 01 2016  09 00   _          _    _   __ __ ____    _
                              (hh mm)
                                               ------UNFORGIVEN SANCTION HISTORY------
---- CU    SANCTI    FORMATION ----  ----START----- -----END------ FULL ACT
    HO    ROTEC      EFFECT? No   RSN    DATE    RSN    DATE     AMT AMT
 (ALREA   VD 6 MO    HSG PRO)         7  01 01 2014  C  02 01 2014  75  75
       S  TION $ A  PPLICABLE: 75
    MONT  ON RU SI   ULY 2001: 81
CONSECUT    MONTHS    OMPLIANCE: 0
        TOTAL MONTHS OF SANCTIONS: 1


  USER:      FNX: CASE MODE: C RPTGRP:              PERIOD: 06 16 COMMAND: _____
  DO:   IMS:     RPTGRP NAME: TONYA                                          3
```

Entering the sanction start date should create a new version of Eligibility with the budget reduced by the sanction amount. It also creates a TODO for the district's G_1 caseload.

Entering the appointment date should create the Appointment Reminder letter.

Completing the Reason for Sanction letter

Enter SPEC/C/FORMS.

```
06/23/16 12:59              IV-A SELECT FUNCTION                    ASTCA1

  ~~~~   Function Codes (FNX)  ~~~~       ~~~~   Function Codes (FNX)  ~~~~
  ABWD - ABAWD Food Stamp History         MAIL - Send or Read Mail
  APPL - Application                      MANA - Managed Care Maintenance
  CASE - Case Status Display              MONY - Financial Subsystem
  CATN - Case Action Log                  NAME - User Name/Number Lookup
  CATS - Cost Allocation/Time Study       PCOL - Premium Collections
  EDS  - Medicaid Management System       PERS - Person Search
  ELIG - Eligibility Results/Approval     PMGT - Premium MGT Report
  FIAT - Fiat Eligibility                 PREM - Premium Management
  FUEL - Supplemental Fuel                QUAL - Quality Review
  GAEL - General Assistance               RECO - Recoupment Schedule
  IDEA - System Change Request            REPT - Report Selection
  INFC - Interfaces                       SPEC - Special Functions
  INQB - Benefit History                  STAT - Statement of Need
  INQD - Benefit Disbursement History     SUBS - Substitute Reporter/Payee
  IV-D - IV-D Select Function             TODO - Daily To-Do Report
  JFIP - Jobs For Independence            UNLK - Releases Locked Cases
  LOGO - Logoff                           VEND - Vendor Search
       ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
  USER:      FNX: SPEC MODE: C RPTGRP: HOH SSN      PERIOD: 06 16 COMMAND: FORMS_
                                                             F8 = MORE
```

Always use the Head of Household Social Security Number when entering SPEC/C/FORMS even if it is the second parent that is being sanctioned.

Place an "X" next to "Reasons for Sanction Letter".

```
06/23/16  15:42            Automated Forms Issuance                    ASQAMFM0

            - Interview Notice (Form 202C)
            - Interview Notice for Reachup (Form 202C RU)
            - Notice of Missed Interview (Form 202D)
            - Reminder Letter (Form 202RL-M)
            - Verification / Review Letter (Form 202RL2)
            - Verification Request (Form 202V)
            - Verification Request (Form 202V) (with optional paragraphs)

            - Verification Change Request (Form 202VCR)
            - Notice of Decision (Form 220)
            - Controlled Vendor Payment Start - (A = Arrearage R = Rent only)
            - Controlled Vendor Payment End - (A = Arrearage R = Rent only)

            - Conciliation Letter (form 617)
            - Conciliation Resolution (form 617CR)
          x Reasons For Sanction Letter
          _ Fair Hearing Withdrawal (Form 113W)

            - Blank Letter
   USER:       FNX: SPEC MODE: C RPTGRP:            PERIOD: 06 16 COMMAND:
   DO:    IMS:      RPTGRP NAME TONYA                         SHIFT-F12= HELP
```
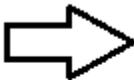
Enter the Social Security Number of the participant that is being sanctioned.

```
Participant SSN # is:    Enter SSN of participant that is sanctioned.


The RUFA type will determine a Reach First or Rufa screen and notice.

To cancel, type 'E'.
```

The name of the participant that is being sanctioned will appear on the top of the screen.

If the name is not correct, try entering the SSN again.

```
*** Please select one date criteria option. ***
06/23/16                    Reasons for Sanction Letter              ASQAMF21

    Dear    TONYA

    You are being sanctioned because, without good cause, you:

        Choose one date criteria: _      on MM DD YYYY
                                   _      from MM DD YYYY  to MM DD YYYY   <===


              _____
              _____
              _____
 ===>         _____
              _____
              _____
              _____

        Rule Citations  _____
              Examples:   (rule 2372)  or  (rules 2193, 2240)          <===
                                            Command = 'MORE or PREV or APP'
        USER:      FNX: SPEC MODE: C RPTGRP:        PERIOD: 06 16 COMMAND: APP_
        DO:    IMS:      RPTGRP NAME TONYA                         SHIFT-F12= HELP
```

Enter an "X" next to one of the date criteria:

o   MM DD YYYY- use this option if it was a onetime event

Example: This would be used for not attending a conciliation meeting.

o   MM DD YYYY to MM DD YYYY- use this option if it was for a period of time

Example: This would be used if a participant did not engage in an activity over a period of time.

Enter the following information:

- The reason the participant is sanctioned (include specifics)

- Appropriate rule citations (refer to the "Reason for Sanction Letter Desk Aid")

- Check ACCESS to determine if the landlord/mortgage company information is listed. If the landlord/mortgage company name and address is not listed include the statement below on reason for sanction letter:

    o   *After you attend your sanction meeting, we cannot release your benefits until you provide your landlord/mortgage company name and mailing address. Please have your landlord/mortgage information available when you attend your sanction meeting.*

Type "APP" in the COMMAND field of the Reasons for Sanction letter.

Final steps to implementing a sanction

Enter a CATN explaining that the participant has been sanctioned, when the sanction starts and stating that they must meet with their case manager to receive any benefits.

Include the Sanction Appointment letter and Reason for Sanction letter with the the signed 606 and get it to the Supervisor/BPS/district designee who enters Reach Up sanctions.

Approve the decrease in benefits on ELIG/C/RUFA. This will create the final two sanction letters, the start of the sanction letter and the reduced benefit letter.

Entering Sanction meeting held date

After participant attends their sanction meeting, enter the sanction meeting held date on CASE/C/SANC screen.

Enter CASE/C/SANC.

```
06/23/16 15:29              IV-A SELECT FUNCTION                  ASTCA1

   ~~~~   Function Codes (FNX)   ~~~~        ~~~~   Function Codes (FNX)   ~~~~
  ABWD - ABAWD Food Stamp History          MAIL - Send or Read Mail
  APPL - Application                       MANA - Managed Care Maintenance
  CASE - Case Status Display               MONY - Financial Subsystem
  CATN - Case Action Log                   NAME - User Name/Number Lookup
  CATS - Cost Allocation/Time Study        PCOL - Premium Collections_
  EDS  - Medicaid Management System        PERS - Person Search
  ELIG - Eligibility Results/Approval      PMGT - Premium MGT Report
  FIAT - Fiat Eligibility                  PREM - Premium Management
  FUEL - Supplemental Fuel                 QUAL - Quality Review
  GAEL - General Assistance                RECO - Recoupment Schedule
  IDEA - System Change Request             REPT - Report Selection
  INFC - Interfaces                        SPEC - Special Functions
  INQB - Benefit History                   STAT - Statement of Need
  INQD - Benefit Disbursement History      SUBS - Substitute Reporter/Payee
  IV-D - IV-D Select Function              TODO - Daily To-Do Report
  JFIP - Jobs For Independence             UNLK - Releases Locked Cases
  LOGO - Logoff                            VEND - Vendor Search

 USER:     FNX: CASE MODE: C RPTGRP: HOH SSN      PERIOD: 06 16 COMMAND: SANC
                                                                    F8 = MORE
```

Always use the Head of Household Social Security Number when entering a sanction even if it is the second parent that is being sanctioned.

Place an "X" next to the participant that is sanctioned.

```
    06/23/16 15:30        *** CASE SANCTIONS MENU SCREEN ***            (ASPEBH)


        Mark 'X' beside a name for full CASE/SANC panel.
        Mark 'H' to view person's Sanction History.

                                                        CURRENTLY
        X RL MEMBER                             AGE SANCTIONED
        - -- -----------------------------------  ---  ----------
        x 01 TONYA                                25
        _
        _
        _
        _
        _
        _


            * * THE EARLIEST A NEW SANCTION CAN BEGIN IS 08/01/16 * *

    USER:      FNX: CASE MODE: C RPTGRP:           PERIOD: 06 16 COMMAND: _____
    DO:   IMS:     RPTGRP NAME: TONYA                                           3
```

Enter the sanction held date.

```
06/23/16 15:34          *** CASE SANCTIONS SCREEN ***            (ASPEBH)
 BPS:                                          DT LST MOD: 01 30 2014
 FSCM:                                             MOD BY:

      SSN:              NAME: TONYA

SANCTION START   -----MEETING WITH CASE MANAGER------    SANCTION END    FORFEIT
RSN ---DATE---    SCHED DATE   TIME   HELD DATE  WAIVER  RSN ---DATE---    RU ?
 7  08 01 2016   08 01 2016   09 00   08 01 2016   _                        ~
                             (hh mm)
                                          -----UNFORGIVEN SANCTION HISTORY------
---- CURRENT SANCTION INFORMATION ----   --START----- -----END------ FULL ACT
   HOUSING PROTECTION IN EFFECT? No         DATE    RSN   DATE       AMT AMT
 (ALREADY RCVD 6 MONTHS HSG PRO)         01 01 2014  C  02 01 2014   75   75
        SANCTION $ AMT APPLICABLE: 75
   MONTHS ON RU SINCE JULY 2001: 81
CONSECUTIVE MONTHS OF COMPLIANCE: 0
      TOTAL MONTHS OF SANCTIONS: 1



USER:      FNX: CASE MODE: C RPTGRP:            PERIOD: 06 16 COMMAND: _____
DO:   IMS:     RPTGRP NAME: TONYA                                           3
```

The sanction held date will create a TODO to the district G_1 case load indicating the benefit can be released. Some districts enter a manual TODO to the district G_1 caseload as well. Other districts send emails to the District Management team or designated staff member.

Waiving the sanction meeting

Enter "Y" in the Meeting with Case Manager "Waiver" field.

```
06/23/16 15:34            *** CASE SANCTIONS SCREEN ***              (ASPEBH)
  BPS:                                            DT LST MOD: 01 30 2014
  FSCM:                                               MOD BY:

     SSN:                  NAME: TONYA

SANCTION START  -----MEETING WITH CASE MANAGER------  SANCTION END    FORFEIT
RSN ---DATE---  SCHED DATE   TIME   HELD DATE  WAIVER  RSN ---DATE---   RU ?
 7  08 01 2016  08 01 2016  09 00                 Y                      _
                          (hh mm)
                                            ------UNFORGIVEN SANCTION HISTORY------
---- CURRENT SANCTION INFORMATION ----      ----STAR---- -----END------ FULL ACT
   HOUSING PROTECTION IN EFFECT? No      RSN   D       RSN   DATE      AMT AMT
(ALREADY RCVD 6 MONTHS HSG PRO)           7  01     14  C  02 01 2014  75  75
        SANCTION $ AMT APPLICABLE: 75
   MONTHS ON RU SINCE JULY 2001: 81
CONSECUTIVE MONTHS OF COMPLIANCE: 0
       TOTAL MONTHS OF SANCTIONS: 1


USER:      FNX: CASE MODE: C RPTGRP:              PERIOD: 06 16 COMMAND: _____
DO:    IMS:     RPTGRP NAME: TONYA                                           3
```

Lifting the sanction in ACCESS

From the CASE/C/SANC screen, place the cursor on the "SANCTION RSN" and hit "Shift F12" for a list of "End SANCTION CODES".

```
06/23/16 15:32            *** CASE SANCTIONS SCREEN ***              (ASPEBH)
  BPS:                                            DT LST MOD: 01 30 2014
  FSCM:        .                                      MOD BY:

     SSN:

SANCTION START   END SANCTION CODES                    ASHD32EE         IT
RSN ---DATE---                                                          ?
 7  08 01 2016        C - COMPLIED
                      D - DEFERRED
                      F - FOUND GOOD CAUSE                              ----
---- CURRENT S        T - TRANSITION OFF SANCTION TO 60 MO RULES        ACT
   HOUSING PR                                                           AMT
(ALREADY RCVD     YOUR SELECTION: .                                     75
     SANCTIO
   MONTHS ON     You may see these codes which are created by ACCESS.
CONSECUTIVE MO   You may not enter them on-line.
      TOTAL M       A - Continuation of sanction data (Administrative)
                    B - Break in benefits cured sanction
                    Z - Person went off benefits under sanction

USER:      FNX:
DO:    IMS:     RPTGRP NAME: TONYA                                           3
```

```
06/23/16  15:34          *** CASE SANCTIONS SCREEN ***                    (ASPEBH)
  BPS:                                              DT LST MOD: 01 30 2014
  FSCM:                                                MOD BY:

       SSN:                NAME: TONYA

   SANCTION START   -----MEETING WITH CASE MANAGER------    SANCTION END     FORFEIT
   RSN ---DATE---   SCHED DATE   TIME    HELD DATE   WAIVER  RSN ---DATE---    RU ?
   7  08 01 2016   08 01 2016  09 00   10 01 2016     _     C   10 17 2016     _
                                (hh mm)
                                                    ------UNFORGIVEN SANCTION HISTORY------
   ---- CURRENT SANCTION INFORMATION ----    ----START----- ----          ---- FULL ACT
       HOUSING PROTECTION IN EFFECT? No     RSN    DATE      RSN                 AMT AMT
   (ALREADY RCVD 6 MONTHS HSG PRO)           7  01 01 2014  C          2014  75   75
           SANCTION $ AMT APPLICABLE: 75
      MONTHS ON RU SINCE JULY 2001: 81
   CONSECUTIVE MONTHS OF COMPLIANCE: 0
       TOTAL MONTHS OF SANCTIONS: 1


   USER:      FNX: CASE MODE: C RPTGRP:              PERIOD: 06 16 COMMAND: _____
   DO:   IMS:      RPTGRP NAME: TONYA                                          3
```

Enter the "SANCTION END DATE".

 Enter a CATN stating the sanction has been lifted.

Entering the Sanction End date should create a new version of ELIG to be approved. Send a TODO to the district G_1 caseload letting them know the sanction has been lifted. Some districts also send an email to the District Management team or a designated staff member.