

P-2350 Case Management Procedures for Households with 60 or more months of Reach Up/Timelimits (23-12)

Federal time limits on TANF

Federal rules limit families to 60 countable months of Temporary Aid for Needy (TANF) cash assistance in a lifetime.

Certain family and benefit situations determine whether a month “counts” toward this 60-month limit.

See Reach Up Eligibility [procedure 2202](#) for more information about Vermont Time Limits.

Once a participant reaches their lifetime limit of 60 countable months on Reach Up, Vermont has slightly different rules in order to continue receiving Reach Up benefits.

If the person is not engaging with Reach Up services, and attempts have been made to re-engage with them, the family’s Reach Up may need to close. See Reach Up Services procedure 2350A for more information.

How Reach Up programs do and do not count towards the 60-months limit

This is based on whether they are funded by federal TANF money, or State of Vermont money.

Reach Up	YES
Reach First	NO
PSE	NO
Reach Ahead	NO

Participation codes/deferments that don't count towards 60-month limit

Within Reach Up, certain months don't count towards the 60-month limit (such as months in which someone could not work due to medical conditions)

Needed in the Home (11)

Medical (33, 34, 35, 38)

Young Child (30, 31, 45, 46) – only the first 12 months of any combination of these codes are non-countable

Domestic Violence (54)

60-Month limits do not apply to certain types of Reach Up households:

- Minor Parents (parents under the age of 18). Both parents must be 18 or older before months' start counting for either parent. Example: 17-year-old parent and 18-year-old parent in the same household--months don't count for either.

- Child only households including:

Non-needy caretaker grants

Single parents who receive SSI

Two parent households where both receive SSI

Ongoing case management for households with 60 or more countable months

For the most part, case management is the same for families that have received more than 60 countable months and those that have received less than 60 countable months.

Time Limit Appointment

In participant's 58th month of Reach Up, send participants a Reach Up Time Limits letter (form [609](#)) with an appointment. The purpose of the letter and the appointment is to remind participants that they are approaching 60 countable months of Reach Up and to discuss the participant's responsibilities as they reach their time limit on Reach Up. If a case closes and reopens, and there is any question if the letter went out, send it again.

The letter can be sent through a macro in ACCESS or the Reach Up Time Limits letter in the Forms Library.

At the time limit appointment, review with the participant their goals and their recent progress on their goals. Use the goal achievement process and

motivational interviewing techniques to determine if the participant's goals remain the same or if they should be updated. Revise and have participant sign new FDP if necessary.

Explain the difference if a household that has received over 60 countable months does not engage with Reach Up services—rather than having their benefit sanctioned, the benefit could close. On occasion while working with families that have received over 60 countable months, remind them of this difference.

Newly assigned households with more than 60 countable months

When a new family applies for and is approved Reach Up, the Reach Up case manager should review the Reach Up program, and specifically point out the difference of what it means to have met their time limits.

2nd parent joins active household receiving Reach Up

When a second parent joins an active household that receives Reach Up and the second parent has at least 60 countable cumulative months, but the head of household has not yet reached their time limits, consider the family as a newly assigned household with more than 60 countable months.

Schedule a case management meeting with both parents within three business days of the reported change. Explain the difference of what it means to have met their time limits.

Household is sanctioned

Active sanction and 2nd parent with over 60 countable months joins

If a Reach Up household is sanctioned when a second parent that has at least 60 countable cumulative months of Reach Up joins, the sanction must be lifted because households that have received over 60 countable months are not eligible for sanction. End the sanction as soon as administratively possible. Schedule a case management meeting with both parents as soon as administratively possible after becoming aware of the reported change. During the meeting explain the difference of what it means to have met their time limits. Work with both parents to determine goals and create plans with both parents.

Active sanction and household is approaching 60 countable months

If a Reach Up household is sanctioned and is approaching 60 countable months, follow the chart below to determine next steps. See Reach Up Services procedure 2350A for more information about closures. Make sure to explain during the time limits appointment what will happen when household reaches 60th month.

Actively Sanctioned Participants

ACCESS shows	Current Month	Action	Examples
59	60th	If participant is able to cure their sanction by adverse action, benefit will remain open.	Bob has 59 countable months as of the end of August and is sanctioned. September is his 60 th month (SPEC C CLOCK will say 59 months). If he cures his sanction before adverse action in September, his benefit continues.
59	60th	If participant is not able to cure his sanction , benefit closes (code 85).	Bob has 59 countable months as of the end of August and is sanctioned. September is his 60 th month. If he has not cured his sanction by adverse action in September, his benefit closes at the end of September.

Determining to sanction or close

Participant not engaging and next step is sanction or closure

If a Reach Up household is not engaging and approaching 60 countable months, follow the chart below to determine next steps. Remember that a household that has reached their 60th countable month is eligible to take part in a conciliation for each instance of non-engagement.

Participant not engaging and next step is sanction or closure

ACCESS Shows	Current Month	Do I enter a new sanction?	Other Information and How to proceed:
57 or fewer	58 th or less	Yes	Proceed to sanction as usual.
58	59 th *	No	Benefit continues as is. Schedule a meeting with the participant to discuss consequences of not engaging in the next month.

			<p>Example: Mary has 58 countable months as of the end of August. September is her 59th month. In September, Mary does not attend her conciliation appointment or follow through with her conciliation resolution. Attempt to reengage with Mary in October. Inform Mary that not engaging in October without good cause will close her Reach Up benefit in October.</p>
<p>Rationale: Because we must treat participants who are not engaging before adverse action the same as participants who are not engaging after adverse action, the benefit will continue as is during the 59th month. Otherwise, someone with 59 countable months who is not engaging before adverse action would be sanctioned for the next month with the chance to cure that sanction and remain open, while someone who is not engaging after adverse action would close.</p>			
59	60 th	No	<p>Close benefits (code 85). Closure should be entered as soon as possible after the first adverse action in the month. Closure can be no earlier than the end of the 60th month but may occur the 15th of the following month.</p> <p>Example: Mary has 59 countable months as of the end of September. October is her 60th month. Mary has already been conciliated for this issue and does not follow through with her conciliation resolution in October. Close benefit for the end of October. (Depending when the non-engagement occurs the closure could be November 15th.)</p>
60 or more	61 st or higher	No	<p>If conciliation has already been attempted for this non-engagement, and participant has not attended appointment or followed through with conciliation resolution, send good cause letter and if no good cause, then close benefit (code 85) at next possible closure time.</p>

*Some deferments stop the clock for participants in terms of countable months. A deferred participant whose clock is stopped and who does not participate in

their 59th month should attempt to be met with and reengaged. Their deferment should remain in effect while trying to reengage. If they continue to not participate, discuss case with Supervisor and send up an AOPs inquiry to develop next steps.

Fair Hearings

If a participant who has closed due to not meeting post-60-month requirements requests a fair hearing, the case manager is responsible for writing up the Fair Hearing and submitting relevant documents according to the [All Programs Fair Hearing Procedure 2127B](#).