
AGENCY POLICY

FAP Only

A Time-Limited Food Assistance (TLFA) individual also known as Able Bodied Adults without Dependents (ABAWD'S) must meet specific work requirements to receive Food Assistance Program (FAP) benefits. Failure to do so limits the individual's FAP eligibility to three months within a 36-month period. TLFA individuals who meet all other FAP eligibility criteria are eligible for three countable months of FAP benefits during a 36-month period.

The 36-month period is a standardized period. Eligible individuals can receive three countable months of benefits within each of the following periods:

Initial Period: January 1, 2017, through December 31, 2019.

Current Period: January 1, 2020, through December 31, 2022.

Next Period: January 1, 2023, through December 31, 2025.

TLFA Waiver Counties

Effective December 1, 2020, all counties are part of the ABAWD waiver and will no longer be subject to Time Limited Food Assistance policy.

ELIGIBILITY FACTORS

TLFA individuals

All FAP individuals age 18 through 49 are subject to TLFA policy unless deferred.

Note: The policy applies to the first calendar month after the 18th birthday through the calendar month prior to the 50th birthday.

TLFA Deferrals

To be deferred from TLFA policy an individual must be one of the following:

1. A member of a FAP group that includes a FAP group member under age 18, even if the individual under age 18 is disqualified or otherwise not eligible; see BEM 212.

Verification:

Information known to the agency.

2. In any stage of pregnancy.

The deferral will begin the month of conception and shall apply until, and include, the month of the child's birth or until the individual is no longer pregnant.

Verification:

Client statement, unless questionable.

3. Determined to be medically certified as physically or mentally unfit for employment (even if temporary).

The physical or mental condition must make the individual unfit to work 20 hours per week on an ongoing basis. An individual is considered unfit for work if they meet any of the following criteria:

- Applied for/receiving temporary or permanent public or private disability benefits. Individuals who have applied for or are receiving temporary or permanent public or private disability benefits are deferred from the time limit.

This includes but is not limited to:

- Veterans disability benefits (any rating of disability).
- Workers compensation.
- SSI application, approval or appeal.
- Participating in Michigan Rehabilitation Services program.
- State issued temporary or permanent disability benefits.

Verification:

If information regarding application or receipt of the disability benefits is known to the agency, no further verification is needed. If this information is not known to the agency, request proof of the receipt or pending application for disability benefits.

Obviously mentally or physically unfit for employment, as determined by the Michigan Department of Health and Human Services specialist (MDHHS).

Individuals who are obviously mentally or physically unfit for work are exempt from the time limit.

To determine if an individual is obviously unfit for work, the MDHHS specialist must conduct an interview with the client. A discussion of the individual's inability to work or participate in work activities for more than 20 hours per week on an ongoing basis is required to make the determination. The discussion should focus on the physical and/or mental challenges that affect or impact the individual's inability to work.

- ***A victim of domestic violence.***

An experience of domestic violence may indicate that the individual is obviously unfit for work. The MDHHS specialist may identify an individual as obviously unfit for work if they are a victim of domestic violence.

- ***Chronically homeless.***

Chronic homelessness is defined as homeless with a disabling condition and residing in a place not meant for human habitation, a safe-haven, or in an emergency shelter and has been homeless and residing in such a place for at least 12 months or on at least four separate occasions in the last three years where the combined occasions must total at least 12 months.

Note: The experience of chronic homelessness may indicate that the household is obviously unfit for work.

- ***Struggling with drug or alcohol addiction.***

A struggle with drug or alcohol addiction may indicate that an individual is obviously unfit for work.

Individuals who are not participating in a treatment/rehabilitation program but are dependent on drugs or alcohol to maintain day to day function may be considered struggling with addiction.

Verification:

Domestic Violence

Use the individual's statement as documentation of the domestic violence circumstance unless a reason exists to

question it. If further documentation is necessary, use any of the following:

- Documentation of service from a domestic violence shelter.
- Medical records.
- Court records (for example, personal protection order or petition).
- Police records (for example domestic disturbance response).
- School records (for example, statement from a school counselor).
- Statement by a licensed therapist or counselor.
- Other case information (including children's services).

Chronic Homelessness

Accept signed documentation from a homeless shelter, local housing assessment and resource agency (HARA) or other homeless service provider. If verification is not available use client statement.

Struggling with Drug or Alcohol Addiction

Individuals who are struggling with drug or alcohol addiction, the individual must provide verification of their participation in a substance abuse treatment program. Individuals who are not participating in a treatment program, MDHHS specialists may accept a written or verbal statement from a medical or mental health professional confirming the individuals alcohol/drug dependency negatively impacts the individual's fitness to work.

Example: John applies for FAP benefits in April and states that he has recently moved to Michigan and is currently homeless. John states that he is currently staying with friends, sleeping at a different place each night until he can secure housing. John is not subject to TLFA policy in April since it is a prorated month. The MMDHHS specialist gives John good cause for May in order for John to secure housing. John will be subject to TLFA policy beginning in June.

Example: Stan applies for FAP benefits and is potentially subject to TLFA policy. Stan states at the interview that he has been homeless for the last three years. The MMDHHS specialist requests and receives verification from HARA verifying that Stan has been homeless for the past 3 years. The MMDHHS specialist observes during the interview that Stan has poor hygiene and struggles with social skills. Based on the MMDHHS specialist's observations of poor hygiene and that Stan struggles with social skills, the verification received from HARA and information provided by Stan, the MMDHHS specialist defers Stan from TLFA work requirements due to being chronically homeless and having a disabling condition due to poor hygiene and his struggle with social skills. The MMDHHS specialist enters the deferral in Bridges and documents the deferral information in case comments.

Note: TLFA policy does not apply when an individual is deferred per BEM 230B; see *Deferred from general work registration requirements* in this item.

Noncompliance and refusing employment penalties in BEM-233B may apply to TLFA applicants or recipients; see BEM 233B

4. Deferred from general work registration requirements in BEM 230B.

Individuals who are deferred from general work registration rules outlined in BEM 230B are also deferred from TLFA work requirements. Individuals who are subject to the time limits must meet the general work registration requirements.

Deferrals from the general work registration requirement (also deferred from TLFA work requirements) include:

- Under age 16 or over age 59 (work registration age limits are different than the age limits under TLFA rules).
- Age 16 or 17 years old who are not the grantee.
- A grantee age 16 or 17 years old who:

Is attending school, or is enrolled in an employment training program, on at least a half-time basis.

See BEM 240 and BEM 245 for verification requirements.

- A parent or other household member responsible for the care of a dependent child under age 6 (the child does not have to be in the FAP group nor reside with the caregiver).
- Responsible for the care of a incapacitated person (the incapacitated person does not have to be in the FAP group nor with the caregiver).
- Physically or mentally unfit for employment.
- Has applied for or is receiving Unemployment benefits (including application or appeals).
- An active participant in an in-patient or outpatient Substance abuse treatment program. This does not include AA or NA.
- An individual who has applied for both FAP and SSI through the Social Security Administration. The application for FAP and SSI must be made at the same time.
- Employed or Self Employed at least 30 hours per week or receiving weekly earnings equal to or in excess of 30 hours times the Federal minimum wage.
- A person subject to and complying with FIP (TANF) work requirements.
- A student enrolled at least half-time in any recognized school, training program, or institution of higher education.

Note: Students enrolled 1/2 time or more in an institution of higher education (Post-Secondary Education) must meet also meet student status defined in BEM 245.

General work registration verification:

Age

- Birth Certificate.
- Hospital certificate of birth.
- Other official records that contain birth information, such as school records, medical records, baptismal records, marriage certificate, insurance policy, etc.

- Forms of identification which contain age or date of birth, such as driver's license, state-issued I.D. card, etc.
- Written statements from two or more individuals who know the individual's age.

Caretaker to a dependent child or disabled individual

Acceptable verification of a caretaker to a child under 6 or caretaker of a disabled individual includes, but is not limited to:

- Medical records about disability.
- DHS 54A.
- Verification from MSW.
- Physician statement.
- Court order.

Physical or Mental Impairment

Verify a medical deferral only in cases where the unfitness is not obvious to the specialist. Document in Bridges and set the review date accordingly. If questionable, a statement from a nurse, nurse practitioner, designated representative at a doctor's office, social worker, or other medical personnel may be accepted verification. If the impairment is not obvious, a MDHHS-54A, Medical Needs, or an MD/DO statement may be used. Verify receipt of RSDI based on disability or blindness and SSI.

If an individual cannot obtain verification free of charge, use a MDHHS-93A, Medical Services Authorization/Invoice, to authorize payment for medical evidence.

Unemployment Compensation (UC) Applicant or Recipient

Use a DHS-32, UCB Claims Information Request, to verify.

Substance Abuse Treatment Center Participant

Use a verbal or written statement from the center.

FAP/SSI

SOLQ. Award letter from SSA; see *BAM 116 SSI/FAP joint application processing*.

Earned Income

See *BEM 500, Employment Income*, for a complete list of acceptable verifications.

In Kind income

See *BEM 500, In-Kind benefits*, for a complete list of verifications

Education

- DHS-3380, Verification of Student Information.
- Telephone contact with the school.
- Other acceptable documentation that is on official business letterhead.

See *BEM 230B* for detailed verification requirements

Note: General work registration requirements and TLFA work requirements are two separate policies that while related to each other, stand alone.

5. Participating in an Office of Refugee Resettlement training program

Individuals participating in the local Refugee contractor program for at least half time will be deferred from the ABAWD time limit as long as they continue to participate with the Refugee contractor.

Verification:

Statement from the local refugee contractor

SATISFYING THE TLFA WORK REQUIREMENT

TLFA individuals who are not deferred must satisfy the TLFA work requirement to maintain FAP benefits for more than 3 months within the 36-month period. There are several ways these individuals can satisfy the work requirement.

For a FAP benefit month not to be countable, a TLFA individual must perform one of the following:

1. Work at least 80 hours monthly (20 hours/week on average).

Work includes:

- Work in exchange for money, including self-employment.
 - Work in exchange for goods or services (in-kind).
 - Unpaid (volunteer) work.
2. MI Works! Agency Employment and Training program.
 3. Participate 80 hours monthly (20 hours/week on average) in an employment and training program administered by the local Michigan Works! Agency (MWA) if available in the county.

Individuals in a MI Works! employment and training component cannot be required to participate more than 30 hours per week. The MWA may permit a participant to substitute hours of education to meet the 80-hour requirement.

Local variations, restrictions and/or policies may apply. Check with the local MI Works! Agency to determine what employment and education/training services are available in the area.

4. Combine work hours and MWA work hours, except workfare or self-initiated community service, that total an average of 80 hours per month.
5. Participate in MWA-assigned workfare. The number of hours worked must equal the FAP benefit divided by state minimum wage, as determined by Bridges. Engage in self-initiated community service activities for a non-profit organization. The number of hours worked must equal the FAP benefit amount divided by state minimum wage, as determined by Bridges.

Note: Do not include non-working TLFA recipients in simplified reporting as outlined in BAM 200. See *change reporting* in this item for a complete explanation.

Employment

Employed TLFA individuals must work at least 80 hours monthly (20 hours/week on average) in order to satisfy the TLFA work requirement.

This activity cannot be combined with self-initiated community service/workfare to meet the work requirement.

Note: TLFA individuals do not have to make minimum wage in order to satisfy the work requirement

Referral to MI Works! Agency Employment and Training program. (In counties where available)

Bridges will generate an automated FAP TLFA referral to the one-stop service centers' One Stop Management Information System (OSMIS), as well as generating a MDHHS-4785-F, FAP Employment and Training Appointment Notice, which is sent to the participant, at the following times:

- Application.
- Redetermination.
- Case change or end of a deferral.
- Member add.

Bridges will automatically refer each mandatory TLFA individual to the local MWA when the MDHHS specialist runs eligibility. If the TLFA individual does not attend the MWA, OSMIS will interface this information to Bridges, but there will be no negative action to the benefits.

Individuals working 20-29 hours or those who are participating in SICS will not receive the automated MDHHS-4785-F.

The MDHHS-4785-F will be generated overnight and can be viewed the next day in *Bridges correspondence history*. When generating the TLFA referral and the MDHHS-4785-F, Bridges will allow 6 days for the referral to be processed through central print before requiring the client to attend the MWA. Bridges will include the date, time and location to appear for their FAP employment and training assignment on the automated MDHHS-4785-F.

If the TLFA individual indicates to the MDHHS specialist that they intend to complete self-initiated community service instead of participating at the MWA, the MDHHS specialist will indicate this by answering yes to the question *Has the individual indicated an interest in completing self-initiated community service to meet the TLFA participation* on the *FAP Time Limited Community Service Activity* Screen. This will end the referral to the MWA and Bridges will generate the MDHHS-1997, Community Service Activity Report.

Bridges will notify OSMIS when a referred applicant is denied FAP benefits, a member is removed, or the case is closed.

MWA Assessment

MWA assesses employability and need for employment support services. TLFA recipients are then assigned to an appropriate employment-related activity.

MWA Participation

OSMIS will interface participation compliance daily which will be populated into the *FAP Time-Limited MWA Activity* screen. Participation hours will be summarized per activity and month. Bridges will determine if the TLFA individual has met their required hours or will be assigned a countable month.

The specialist will need to go into OSMIS to view other information relevant to the MWA participation.

The MWA may continue to monitor individuals for 90 days after employment begins, even if the FAP case closes, for retention services. OSMIS will interface all terminations to Bridges through the overnight file.

Self-Initiated Community Service

Self-initiated community service (SICS) is unpaid work for a nonprofit organization in exchange for FAP benefits. Local MDHHS offices may maintain and make available a list of nonprofit organizations willing to accept volunteers. The MDHHS-1997, Community Services Activity Report, will be sent monthly when it is indicated in Bridges that the individual intends to use this activity to meet their TLFA requirement.

If an applicant has used countable months but has initial countable months remaining, Bridges will approve the application for that number but will require verification of the self-initiated community service monthly, via the MDHHS-1997, to avoid a countable month.

The number of hours worked must equal the monthly FAP benefit divided by state minimum wage, as determined by Bridges.

Note: Bridges will display the required SICS hours on the FAP EDG, as well as populating them on the MDHHS-1997, FAP Community Service Activity Report.

Instruct the individual on Self-initiated community service policy and potential sites. It is the individual's responsibility to approach the organization and to obtain the signed MDHHS-1997, Community Service Activity Report, from an agency representative certifying the number of hours to be worked each month.

Note: ABAWD's participating in SICS to meet their TLFA work requirement are not eligible for Direct Support Services funds to support this activity; see BEM 232.

Self-Initiated Community Service Verification:

Case copy of a MDHHS-1997, Community Service Activity Report, certified by the nonprofit or government organization.

**Self-Initiated
Community
Service/Workfare –
Multiple group
members**

If a FAP group has more than one TLFA member and one member selects SICS or workfare (in counties where available) to meet their required hours, all mandatory group members will meet the work requirement, as the hours of participation for SICS and workfare are based on the FAP benefit divided by the state minimum wage.

Members of the same FAP group may split the required workfare or self-initiated community service hours in any combination between the FAP group members or a single group member subject to the time limit may choose to complete all the required hours on behalf of the household.

Regardless of the combination, by the end of the month, the household must complete the required hours, or the entire group may receive a countable month (unless the work requirement was met another way).

Example: In a single-member case with \$ 192 in monthly FAP benefits, the individual must perform 20 hours per month of community service ($\$192 / \text{state minimum wage} = 20.31 \text{ hours}$), round down.

Example: In a two-member case with \$268 in monthly FAP benefits, a total of 28 hours, or 14 hours per month of community service per individual ($\$268 / \text{state minimum wage} = 28.35$ hours, or 14 hours each), must be performed.

Example: Harold and Maude are a married couple who are both subject to TLFA work requirements. They opt to complete SICS as their activity. Their combined hourly requirement for SICS is 43 hours a month. Harold volunteers at the local food bank for 43 hours each month and both TLFA members meet the requirement and do not receive any countable months.

Example: In the month of October, Harold only completes 38 hours of SICS of the 43 hours required. Maude does not complete any hours of SICS. It is determined that he does not have good cause, and both TLFA members receive a countable month.

Referral to the Refugee Contractor

Refer mandatory refugee TLFA individuals who have arrived in the U.S. within the last 5 years to the refugee contractor upon application, when a recipient's reason for deferral ends or a member add is requested. When a referral to the refugee contractor is required, the MDHHS specialist must manually generate the MDHHS-4785-RF, FAP Refugee Employment and Training Notice, and the MDHHS-142, Time Limited Food Assistance Notice.

The MDHHS specialist will generate the MDHHS-4785-RF and MDHHS-142 for each mandatory TLFA individual who has arrived in the U.S. within the last 5 years. If the individual has been in the country for 5 years or more, the MDHHS specialist will run eligibility to automatically generate a MDHHS-4785-F, Employment and Training Referral Notice, and the individual will be referred to the local MWA.

If the local MDHHS does not have a refugee contractor, the MDHHS specialist will use the automated process to refer the mandatory TLFA individual to the local MWA.

The last date for a participant to contact the refugee contractor is 30 days from the date the MDHHS 4785-RF is sent. If a mandatory TLFA individual calls to indicate the he or she needs more time to attend orientation at the refugee contractor, the MDHHS specialist will contact the refugee contractor to extend the deadline.

The MDHHS 4785-RF must be returned to the local office with a date stamp from the refugee contractor to verify completion of the orientation.

See *BEM 230C, Exhibit - Refugee Contract Providers*, for a list of the counties and providers.

Case Documentation

Bridges will track each countable month on the *Time-Limited Food Assistance Activities* screen which displays a month-by-month account of work, work-related activities, self-initiated community service, deferrals, countable months, case number changes and closures. Update the documentation at every redetermination, when notified by the MWA, and when a TLFA individual's status changes.

PENALTIES

Noncompliance or refusing employment penalties in BEM 233B do not apply to TLFA countable months. Use *countable month* and *36-month time-period policies* in this item instead.

Countable Month

A countable month is a calendar month in which a full FAP benefit is posted to an EBT account and the recipient does not meet a TLFA deferral or work requirement, without good cause.

The MDHHS specialist must explain to each TLFA individual that the work requirement is in effect for the first full month of benefits and the individual is responsible for meeting the work requirement in that first month.

Example: A TLFA individual applies for FAP on February 6th and is approved, with March being the first full month of benefits. The individual is referred to the MWA in March but does not attend. The individual does not complete 80 hours of MWA participation or meet the work requirement in another way. March is a countable month. As February is a prorated month, the individual is not subject to the TLFA work requirements.

Example: The MWA documents that the individual was assigned to a work activity on August 1st but did not meet the participation requirement for the month. If the individual did not have good cause, August is countable.

A month is also countable if the individual begins meeting the work requirement but does not continue through the end of the month, without good cause, and the individual does not become deferred.

Example: A nonprofit agency documents that an individual offered janitorial help, which is self-initiated community service. On August 25-26 the individual completed 10 hours (out of 14 hours needed to work-off the \$130 FAP benefit). The individual did not return to complete the hours and did not have good cause. August is countable.

Out of State Countable Months

A month in which an individual received FAP benefits in another state as a TLFA individual, beginning January 1, 2017, without meeting the work requirement or deferral criteria, is countable. Accept the other state's word and document in Bridges on the *FAP Time-Limited Details* Screen. Email Policy-Employment@michigan.gov if you need a countable month added due to an out of state inquiry.

Example: Maude moved from Colorado in June and reported she had been receiving FAP benefits ongoing. The MDHHS specialist confirmed that two of the months received were countable time limited months. The MDHHS specialist added the months to the *FAP Time-Limited Details* Screen. Maude has one countable month remaining.

Bridges tracks each TLFA individual's countable months, on the *FAP Time-Limited Details* Screen, as well as displaying the countable months on the *FAP EDG* screen. Other FAP group members may remain eligible even if one TLFA group member uses three countable months and is no longer eligible; see *disqualified or ineligible persons* in *BEM 550* and *closure and member disqualification*, in this item.

Removing a Countable Month

Remove a month recorded as countable if later information verifies the month should not have been countable by updating the information on the *FAP Time-Limited Good Cause* Screen.

Example: The individual failed to work, cooperate with the MWA or perform community service in July and August. Medical documentation received in September verifies she has been

pregnant since July. In order to remove the countable month, the specialist will update the *Time-Limited Good Cause* page to give good cause to July and August. The specialist will also update the employment code in Bridges data collection to pregnant. Document the good cause reason in Bridges.

Example: The individual completed only part of the required community service hours for July and August. In September verification is provided documenting illness and inability to work during the last two weeks of July. Update the *Time-Limited Good Cause Screen* to give good cause to July. August remains a countable month.

Met Requirements

In some instances, individuals may have met TLFA work requirements but still received a countable month. Reasons for met requirements:

- Late hour entry.
- Hearing decision.
- Work requirement was met – other.

If the individual or MWA verifies that the individual met requirements, indicate in the TLFA summary under the *good cause tab*, the met the requirement reason and document in the comments box how the individual met requirements.

Example: John completed SICS with a local non-profit agency in the month of October. John returned his DHS 1997; to verify his SICS on November 3rd. John received a countable month for October due to not verifying his SICS hours until November. The MMDHHS specialist indicated in the TLFA summary that John met requirements due to late hours entry. Bridges removed the countable month and sent John a MMDHHS-5538, Countable Month Correction Notice.

Good Cause

Good cause is having a valid reason for failing to work at least 80 hours monthly (20 hours/week on average), failure to participate in an employment and training program at the MWA or failure to participate in workfare or self-initiated community service.

An individual who worked or participated less than the required hours is considered to have met the work requirement if all the following conditions are met:

- The absence was due to circumstances beyond the individual's control.
- It was temporary.
- The individual has retained the job, MWA employment and training slot, workfare slot or community service position.

Document the good cause determination on the *FAP Time-Limited Good Cause* screen. Case comments detailing the reason for good cause are mandatory. The following are examples of good cause reasons:

- Personal illness.
- Death or illness of a household member requiring the presence of the TLFA recipient in the home.
- The unavailability of transportation.
- Lack of work (employer must verify).
- Household emergency.
- Temporarily unfit for work.

Verification of Good Cause

Verification of good cause is only required if the specialist considers the claim questionable. If questioning the good cause, the specialist will need to answer yes to the question *Is the good cause claim questionable* on the *FAP Time-Limited Good Cause* screen.

A MMDHHS -3503 will be triggered when EDBC is run, to request the verification. Once received, the specialist will need to return to this screen and select the appropriate verification source from the drop-down menu to approve the good cause reason. If the verification is not returned, the month will remain countable.

If the month that the good cause was not verified is the third countable month, Bridges will take the appropriate action to close the FAP case (if a single person case) or disqualify the TLFA individual.

36-Month Time-Period

Individuals who are neither deferred nor meeting the TLFA work requirement may receive FAP benefits for only three countable months in a 36-month period.

If an applicant has used some countable months, but has initial countable months remaining, Bridges will approve the application for the number of months remaining.

Follow redetermination procedures before the end of the current benefit period; see BAM 210. Unless the individual is deferred or meets the TLFA work requirement, deny further eligibility until the 36-month period expires or the individual meets *regained eligibility criteria* in this item, whichever is earlier. Do not continue eligibility based on individual assurance that requirements will be met.

REGAINED ELIGIBILITY

An individual who has received three countable months of FAP benefits can regain FAP eligibility (within the 36-month period) by meeting one of the following within any 30-day period after the last benefit month but prior to application:

- 80 hours of employment.
- Self-initiated community service for the number of hours determined by Bridges (the number of hours must equal the FAP benefit amount divided by minimum wage) that would have equaled the individual's FAP benefit for that period.
- TLFA deferred; see *Time-Limited Deferrals* in this item.

Note: Individuals who regain eligibility via deferral, then lose the deferral, must meet one of the other criteria above before benefits can be authorized, including the three-month extension.

Do not prospect regained eligibility; unless deferred, the applicant must have met the 30-day work requirement prior to application. If the individual wants to perform self-initiated community service determine the monthly benefit and required hours. The individual must complete the community service hours prior to authorization of any benefits. If the individual plans to work or participate in an

employment and training component, 80 hours must be completed prior to authorization of any benefits.

At application, treat the work requirement like a verification requirement. If the individual meets the work requirement within any 30-day period prior to the application date, the begin date is the date of application. If the individual fails to meet regain criteria within any 30-day period prior to the application date, the application will be denied.

Individuals who regain eligibility remain eligible each month that they continue to meet one of the above work requirements or are deferred.

Regained Eligibility - Expedited FAP

TLFA individuals who indicate on the application or during the FAP interview that they have regained eligibility but have not provided proof of their regained eligibility activity, can be eligible for expedited food benefits if all other eligibility factors are met.

The MMDHHS specialist will request the regained eligibility verification and approve expedited FAP. Once the verification is returned the MMDHHS specialist can proceed with normal case processing. If the verification is not returned, the MMDHHS specialist will close the FAP for failure to return verifications.

TLFA individuals who have not indicated they have regained eligibility on the application or during the FAP interview are not eligible for expedited food benefits.

Verification Regained Eligibility:

Verification that the work requirement was met prior to application is required in order to regain eligibility.

If verification of meeting the work requirement is not returned the application may be denied after the verification due date; see BAM 115.

Three-Month Extension

Individuals who have regained eligibility by meeting the TLFA work requirement, then fail to maintain the work requirement, receive

three additional months of benefits if otherwise eligible. The first month of these extended months, is the first month the work requirement is not met.

The extended months of benefits cannot be interrupted, regardless of whether the individual participates in a work activity or becomes deferred. Bridges will end the benefits during the extension months only if the individual fails to meet other FAP eligibility criteria. The extension is available only once in a 36-month period.

Example: The individual regained TLFA eligibility for the first time by meeting the work requirement in July, then failed to meet it in August and is not deferred. They are eligible for extension benefits for August, September and October. To receive November benefits, they must first meet the work requirement or be deferred.

Example: The individual regains eligibility for July due to a medical condition that does not extend beyond July. They are not eligible for extension benefits in August, September or October because they did not regain eligibility through the work requirement. To receive further benefits during the 36-month period, they must meet one of the criteria in *regained eligibility* in this item.

Note: A policy exception is required for any adjustment to extension months.

After the Three-Month Extension

There is no limit to the number of times an individual can regain eligibility. Following the extension, for the remainder of the 36 months, Bridges will determine the individual's eligibility on a month-to-month basis. Each month, the individual must meet the TLFA work requirement or be deferred to receive benefits.

If the individual fails to meet the work requirement after the three-month extension, FAP benefits must be recouped for any benefits received for any months the work requirements were not met or the individual was not deferred.

CASE CLOSURE OR MEMBER DISQUALIFICATION

Bridges will determine when the countable months (either the initial three or from an extension) have been exhausted for each individual; see *countable months* in this item.

- On the 17th of the third countable month Bridges will generate the MDHHS-142-A, TLFA Third Countable Month/Out of State Countable Month, notice to inform the individual that unless they meet the work requirement for the third countable month the case will close, or the individual will be disqualified from the group
- If the countable months are exhausted, Bridges will generate the MDHHS-1605, client notification, with timely notice to close the case or disqualify the TLFA member
- If a TLFA member in a TLFA group becomes ineligible, a pro-rata share of their income counts toward the remaining eligible group members. If the benefit period will expire at or before the third countable month, just complete the redetermination

Case closure or member disqualification verification:

If sending a MDHHS-1605, Client Notice, the effective date is the last workday of the third countable month unless timely notice is too late to affect that month. (Do not recoup any additional issuance provided the change was reported timely and the timeliness standard was met for processing the change.)

BENEFIT PERIODS

Bridges will determine a benefit period based on the individual's situation at application and redetermination and will assign the benefit period end date to avoid ineligible issuances.

If the individual has already used countable months. Bridges will assign the appropriate benefit period for each month to ensure benefits are not issued incorrectly. Bridges will review data entered in Bridges for employment, MWA participation or community services when determining eligibility for the next benefit period.

For individuals deferred due to an incapacity expected to last longer than three months, Bridges will set the benefit period to end the month the incapacity will end; see *deferral for disability* in *BEM 230B* and *TLFA deferrals* in this item.

It is the TLFA individual's responsibility to report when hours of work drop below 80 hours monthly. If a change is not reported timely, establish an over-issuance for any ineligible months; see BEM 700, Benefit Over-Issuance.

Change Reporting

TLFA applicants and recipients are required to report as specified in BAM 105. Do not include TLFA applicants or recipients who are not working 20 hours or more per week in simplified reporting; see *BAM 200*.

If a FAP recipient who is following simplified reporting requirements becomes subject to TLFA requirements during the 6-month benefit period, do the following:

If a change is reported during the benefit period:

- Process the change according to policy outlined in *BAM 220, Case Actions*.
- End the simplified reporting requirement. Do not change the benefit period.
- Bridges will issue the individual MMDHHS-2240, Change Report.
- Inform the individual of the eligibility requirements for TLFA as outlined in policy; see *informing individuals* in this item.
- Bridges will assign the appropriate benefit period based on client participation documented in the system.

Note: TLFA individuals working over 20 hours a week can remain a simplified reporter until their hours drop below 20 hours a week.

If a change is discovered at redetermination:

- Inform the individual of the eligibility requirements for TLFA; see *informing individuals* in this item.
- Process the redetermination as a new TLFA application.
- Do not process any over-issuances or penalize the individual.

When informing Individuals, Bridges will issue the MDHHS-142, Time Limited Food Assistance Notice, to everyone who becomes subject to the TLFA requirements. Use the MDDHS-142 to explain Time-Limited FAP policy to every TLFA individual at application, redetermination, and when a change results in TLFA status (for example, individual reports employment ended).

Note: Bridges will generate the MMDHHS-142-B, Time Limited Food Assistance Requirements Ending, to inform individuals when they are no longer subject to TLFA work requirements. This notice will be issued in the following instances:

- The individual becomes deferred.
- The individual is no longer subject to TLFA requirements.

Example: Aretha lives in Kent County and is subject to the TLFA work requirements. On July 28 Aretha turned 50 years old. Bridges will issue the MDHHS-142-B indicating Aretha is no longer subject to the time limit due to turning age 50.

REPORTS

TL-200 TLFA Report

The TL-200, TLFA Report, will allow users to view important details on TLFA participants and their current participation status.

This daily report can be broken out by county and district. This report identifies individuals age 18 through 49 who are subject to TLFA policy. These individuals are identified by participation status, as well as the deferral/participation reason, deferral end dates, and the number of countable months that have been used.

Local offices may use this report in any manner considered beneficial.

VERIFICATION REQUIREMENTS

Verify eligibility factors, work requirement criteria and educational participation.

Verify a reason for deferral from the TLFA work requirement only if it is not obvious and the information provided is questionable (for example, information is unclear, inconsistent or incomplete); see *deferrals* in BEM 230B.

Document in the case record the reason for granting the deferral and the length of time before the continuing need for the deferral will be reviewed.

Do not deny an application solely because an employer has not verified the income and hours. After taking reasonable measures to obtain actual income and hours, consult the individual and use the

best avail-able information. Document in Bridges the attempts to verify and why they were unsuccessful.

LEGAL BASE**FAP**

Public Law 104-193, as amended. Public Act 294 of 2000.
7CFR 273.2.12, 24.