


MEMORANDUM

DATE: January 11, 2018

TO: Local Workforce Development Boards (LWDB)

FROM: Shila A. Salem, Chief, Bureau of One Stop and Program Support 

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) – Good Cause Process Changes

The sanction process for able-bodied adults without dependents changed as of December 9, 2017, to incorporate a good cause consideration period. Federal regulations at 273.7(f)(i) require a determination of good cause upon the notification of a participant's noncompliance. Based on this regulation and feedback received from the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS), processes in the One Stop Service Tracking (OSST) and the Florida Online Recipient Integrated Data Access (FLORIDA) systems were modified by the Department of Economic Opportunity (DEO) and Department of Children and Families (DCF) to facilitate this process.

Good cause determinations remain the responsibility of the Department of Children and Families. However, the new process includes additional functionality in the One Stop Service Tracking (OSST) system to facilitate good cause consideration. The enhanced functionality works as follows:

- Once a participant fails to comply, a sanction will be requested (automatic or manual) in OSST. Prior to the sanction being imposed, the good cause process will occur and the sanction request will show up as a SNAP E&T Conciliation in OSST.
- An interface from OSST to FLORIDA will notify DCF of the failure to comply.
- DCF will generate a good cause notice to send to the participant. The participant will also be able to report good cause by submitting a change request through their MyACCESS account.
 - The participant has ten days to report/respond to the good cause notice.
- If the participant reports to the career center to comply before the good cause consideration period runs out, the case manager must end the conciliation/sanction request with "complied." In addition, if the noncompliance was requested by mistake, the case manager must end the conciliation/sanction request with "entered in error."
- If good cause is granted, DCF will enter the good cause information into FLORIDA, which in turn will interface to OSST.
 - OSST will automatically end the sanction request with an outcome of "good cause."

- The case manager should notify the participant of the outcome and instruct them to continue engagement in the assigned activities for the month.
- If good cause is not granted, DCF will inform the participant of the denial and issue a Notice of Adverse Action (NOAA).
 - If OSST does not receive a response from the FLORIDA system or the good cause request is denied within ten days, OSST will automatically request a sanction (no staff intervention required).
 - The NOAA will inform the participant of the exact noncompliance, instruct them to report to the career center for assistance, and list the date the sanction will go into effect.
 - The participant will have up until the effective date of the sanction to comply.
 - If the participant does not comply before the effective date of the sanction, he or she must serve the full penalty period associated with the sanction level.
 - After serving the full penalty period, the case manager must give the participant a compliance activity.
 - After the compliance activity is completed, the case manager must submit a sanction lift request in OSST.
 - OSST will automatically interface the sanction lift request to the FLORIDA system for DCF to end the sanction.
 - The participant must reapply for benefits with DCF.
 - Upon approval of benefits, the participant may be referred to the E&T program again.

A video demonstrating the good cause consideration functionality can be viewed on the Alternative Plan screen in OSST.

Please share this information with appropriate staff. Questions may be submitted to the SNAP E&T mailbox at SNAPETProgram@deo.myflorida.com.

SAS/odm

Attachment: [Good Cause Process Flowchart](#)

cc: Trina Travis
James Finch