
**TIME LIMIT
PHILOSOPHY**

Time limits are essential to establishing the temporary nature of aid as well as communicating the Family Independence Program (FIP) philosophy to support a family's movement to self-sufficiency. The message that FIP is temporary is an important part of how Michigan helps parents take advantage of the opportunities for work as well as self-sufficiency and independence. Families receiving FIP are to engage in activities that will help them gain financial independence and increase self-sufficiency. There are two types of time limits that Michigan enforces, the federal time limit and state time limit.

**FEDERAL TIME
LIMIT**

Temporary Assistance to Needy Families (TANF) is the federal grant that funds most FIP benefits issued by the Department. The Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) established a five-year (60-month) lifetime limit on receipt of federal TANF assistance for adult-headed families. The begin date for the federal time limit counter is October 1, 1996.

**Federal Countable
Month**

Each month an individual receives federally funded FIP, the individual receives a count of one month. Bridges will deny or close any federally funded FIP Eligibility Determination Group (EDG) when an individual on that EDG reaches the 60-month federal time limit.

State Funded FIP

Any month an individual's FIP benefit is state funded does **not** receive a federal time limit count. A state funded FIP EDG is identified as:

- Two parent households.

Exception: If one of the parents receives SSI, the case is considered a single parent household and the case is federally funded.

- A case that has a parent deferred from the work participation program due to a verified disability or long-term incapacity lasting longer than 90 days; see BEM 230A.
- Court-ordered unrelated caregivers receiving FIP for a child placed in the home by children services; see BEM 210.
- The only dependent child in the FIP group is 19 years old and attending high school full-time. This applies to months before October 1, 2011.
- A FIP group with no dependent child(ren). This applies only when the legal parent(s) and/or stepparent receives FIP when their dependent child(ren) is in an out-of-home foster care placement due to abuse and/or neglect when there is a plan to return the child(ren) to the parent's home; see BEM 210.

STATE TIME LIMIT	The state time limit reflects the number of remaining months an individual has to receive FIP in the state of Michigan. Michigan has a 48-month lifetime time limit. The begin date for the state time limit counter is October 1, 2007.
State Countable Month	Each month an individual receives FIP, the individual receives a count of one month. Bridges will deny/close any FIP EDG when an individual on that EDG reaches the 48-month state time limit.
Exemptions	The state time limit allows exemption months in which an individual does not receive a count towards the individual's limit.
10-1-11 to present	<p>Effective October 1, 2011, exemption months are months the individual is deferred from the work participation program for:</p> <ul style="list-style-type: none"> • Domestic violence. • Age 65 and older. • A verified disability or long-term incapacity lasting longer than 90 days. • A spouse or parent who provides care for a spouse or child with verified disabilities living in the home. <p>See BEM 230A for eligibility criteria for exemptions.</p>
10-1-07 to 9-30-11	<p>Exemption months are months the individual was deferred from participating in the work participation program.</p> <p>Exception: Months an individual met the work participation requirements without attending the work participation program for the following reasons do count against the individual's state time limit:</p> <ul style="list-style-type: none"> • Working 40 or more hours per week. • Vista volunteer (Job Corps and AmeriCorps). • Months an individual received Extended FIP (EFIP).
OUT-OF-STATE CASH ASSISTANCE MONTHS	<p>Cash assistance (TANF) an individual received in other states counts towards the individual's Federal and state time limit. If an individual reports to the Department that he/she received cash assistance in another state, do not certify eligibility for FIP until those months are added into Bridges by central office. Failure to allow central office to input the correct out-of-state months may lead to the individual receiving FIP inappropriately.</p> <p>Individual months that were received by the individual in another state may be disclosed on the DHS-1171, Assistance Application, or the indi-</p>

vidual provides an out-of-state driver's license. Be sure to ask the individual what state he/she received cash assistance in and for what months. Email the following to Policy-Time-Limits@Michigan.gov:

- Individuals name.
- individuals client id.
- Individuals case number.
- Individuals social security number.
- Individuals date of birth.
- States individual received cash assistance in.
- Months the individual received cash assistance.

Note: If an individual does not remember the months that he/she received cash assistance in another state, provide the state(s) name and the individuals best estimate.

Central office will contact the other state to get the individuals countable months and input the results into Bridges. Central office will notify the specialist that the countable months have been added to the individual's time limits in Bridges. After the months are entered into Bridges by central office, the specialist will need to run eligibility and certify the FIP EDG.

Member adds need to go through the same process.

Note: Be sure to check old DHS-1171's at redetermination to capture previously reported out-of-state benefits to add to individual time limit counter.

Example: Sarah moves to Michigan and she received 40 months of cash assistance in Ohio. Once central office puts the 40 months into Bridges, Sarah will have a federal time limit count of 40 and a state time limit count of 40.

SANCTIONED MONTHS

Each month an individual serves in a sanction period is counted towards their state time limit. The count of a sanction month starts October 1, 2007.

Sanctioned reasons that count towards the individual time limit are:

- Employment and training noncompliance.
- Family Automated Screening Tool (FAST) noncompliance.
- Family Self-Sufficiency Plan (FSSP) noncompliance.
- Family Strengthening Activities noncompliance.

Example: Penny has a state time limit of 10 months. Penny must serve a six month employment and training sanction. Once she has completed the sanction, her state time limit count will be 16 months. Her federal time limit will remain at 10 months.

Example: Bruce must serve a three month employment and training sanction from September 1, 2007 to November 30, 2007. December 1, 2007, he will have a state time limit of three for October, November and December. September is disregarded because the state time limit starts October 1, 2007.

INDIVIDUAL TIME LIMIT

The federal and state time limits are applied at an individual level.

Individuals that receive a time limit count are:

- Adults age 18 and older that have a FIP EDG participation status of Eligible Adult or Disqualified Adult due to a sanction listed in Sanctioned Months in this item.
- Minor parents that are the head of household.

Individuals that do **not** receive a time limit count are:

- Dependent children age 18 and younger that have a FIP EDG participation status of Eligible Child.
- Ineligible grantees (for example, grandparents, SSI recipients) that have a FIP EDG participation status of Other Adult.
- Dependent children age 19 and in high school full-time with a FIP EDG participation status of Eligible Child. (This applies only from October 1, 2007 to September 30, 2011).

Two parent families will have two individual time limit counts. The parent with the highest time limit count is applied to the FIP EDG time limit. Once the parent with the highest count reaches a time limit, the FIP EDG closes.

Two parent FIP EDGs that close due to a parent reaching a time limit and that parent leaves the home, the remaining parent may reapply for FIP until the remaining parent's time limit is reached.

If it is reported to the Department that the parent that affected the FIP EDG closure is out of the home and a new DHS-1171 is submitted, request a Front End Eligibly (FEE) investigation from the Office of Inspector General (OIG) to complete a home visit to verify the parent is out of the home. Do **not** determine eligibility on the pending FIP EDG until the FEE agent completes an investigation.

Example: A two parent household with two children receive FIP. Paul has a state time limit count of 10 months and Susan has a state time limit count of 48 months. Their FIP case closes due to Susan reaching her state time limit. Paul completes a new DHS-1171 and reports that Sally is out of the home. The specialist notifies the FEE agent. The FEE

agent verifies Sally is out of the home. Paul is eligible to receive FIP for himself and the children. His first month of FIP benefit will add to his state time limit equaling 11 months. Since he was previously part of a two parent household that was state funded, he will now have a federal time limit count of one.

FIP APPLICATION AFTER A TIME LIMIT IS REACHED

Once an individual reaches a federal or state time limit and the FIP EDG closed, the individual is not eligible for FIP if the individual reapplies and meets an exemption criteria based on the funding source.

Example: Judd's FIP EDG closed in January for exceeding his state time limit. In December, Judd reapplied for FIP claiming he was disabled lasting longer than 90 days. Bridges will deny his application for FIP and determine eligibility for State Disability Assistance (SDA).

Exception: At application, Bridges looks at the funding source for the FIP EDG. If the FIP EDG at application is State Funded and an individual has already reached his/her federal time limit, Bridges will approve the EDG until the individual reaches his/her state time limit or until the FIP EDG returns to federally funded.

Example: Peter has a federal time count of 60 months and a state time limit count of 10 months. He applies for FIP with a disability lasting longer than 90 days and is approved FIP. The FIP EDG is State Funded and Peter will not get a count towards his federal time clock. Once Peter's disability ends, his FIP EDG will return to federally funded and close due to reaching his federal time limit.

LEGAL BASE

Social Security Act 408(a)(7)

MCL 400.57 et seq.