



VERMONT

---

**Department for Children and Families**

*Economic Services Division*  
103 South Main Street  
Waterbury, Vt., 05671-1201  
www.dcf.state.vt.us

(Tel) 1-800-479-6151  
(Fax) 802-769-2186

*Agency of Human Services*

**TO:** Legislative Committee on Administrative Rulemaking

**FROM:** Heidi Moreau, Interim Reach Up Director

**DATE:** March 26, 2014

**Subject:** 14P003 Reach Up, Reach First, and Postsecondary Education Program Rules

In response to comments from Legislative Council regarding the ambiguity of language in sections 2238(C)(1), 2238.2(C), and 2238.2(D) of the above-referenced rule, the Department proposes to revise the rule in order to clarify this language. In addition, the Department proposes to revise sections 2238.2(A) by deleting the reference to “full calendar” in the phrase “full calendar months” to align with the language in 2238.2(C) and to ensure that participants whose grants are terminated mid-month are not subject to a lengthier break in benefits than participants whose grants are terminated at the end of the month. The text of these proposed changes are included in the attached document.

---

Time Limits

---

C. The time limit shall not apply in the following cases:

1. ~~A parent in a single or two-parent family is under the age of 18 (Both parents in a two-parent family must be 18 or older for the time limit to apply);~~ Single or two-parent families with at least one parent under the age of 18;
2. A dependent child living with a non-parent caretaker who is not in the assistance group; or
3. A dependent child living with a single parent who receives SSI/AABD benefits, or with two parents who both receive SSI/AABD benefits.

2238.1 Termination after 60 Months

For families who have received 60 or more countable, cumulative months of assistance, noncompliance with Reach Up services component requirements, without good cause, or not fulfilling the work requirement, regardless of good cause, will result in termination of the family's Reach Up grant. Good cause shall be determined according to rules 2372 and 2373.

2238.2 Reapplication after 60 Months

- A. A family whose Reach Up grant was terminated for either noncompliance or not fulfilling the work requirement, without good cause, after having received 60 or more countable, cumulative months of assistance may be eligible for assistance at any time following a break in assistance of at least two ~~full-calendar~~ months.
- B. A family whose Reach Up grant was terminated for a reason other than noncompliance or not fulfilling the work requirement, without good cause, after having received 60 or more countable, cumulative months of assistance may be eligible for assistance at any time following termination of the grant.
- C. A family whose Reach Up grant ~~was~~ will be terminated for a reason other than noncompliance or not fulfilling the work requirement, without good cause, must continue to comply with all Reach Up requirements until the grant is terminated; a family who does not comply with these requirements and does not have good cause for not complying, will not be eligible to receive benefits for two months from the date the grant is terminated.
- D. Assistance shall be paid only upon complying fully with post-60-month FDP requirements (rule 2334) for a period of two consecutive weeks or, in the case of applicants claiming a deferment, upon supplying verification of and meeting the criteria for the deferment. ~~Subsections (A) and (C) do not apply to families who are not granted benefits due to not completing the two consecutive week period of compliance or not supplying verification of a deferment.~~ A family whose application is denied for not completing the two-week period of compliance or supplying verification of a deferment may reapply at any time.