

MFIP Sanction Reform Questions and Answers – Version 1

See policy bulletin: [DCYF Bulletin 26-11-02 Minnesota Family Investment Program Sanction Reform](#)

The Combined Manual and Employment Services Manual will be updated for June 2026.

Version 2 of this document will include additional questions which are not answered in version 1. Watch SIR for updates to this document and for additional system updates.

Please submit additional questions, including case specific questions, through PolicyQuest.

1. Where can we find the presented PowerPoints and recordings for sanction reform?
 - a. The PowerPoint and other resources related to MFIP sanction reform are located under Worker Resources – Cash on the new [MFIP Sanction Reform](#) page.

2. I'm hearing two different things that aren't in congruence. I heard if participants come into compliance "by" the 15th of the month, their sanction will be lifted for that month. I also heard, if they come into compliance "on the 15th or later", their sanction for that month would not get cured for that month. So, for clarity, can the participant come into compliance ON the 15th of the month to get sanction cured for that month?
 - a. Yes. A participant who is in compliance on or before the 15th of the month will have their benefits restored for that month.

3. Sanctions are a motivator for participants to come into compliance and start engaging/re-engaging in employment services. I'm wondering if you have any recommendations on how to keep participants engaged. I think Employment Services workers will see a shift with some participants' level of engagement and overall compliance decreasing.
 - a. We understand your concerns about maintaining participant engagement. The intent behind the changes to the sanction policy is to move away from relying on significant grant reductions and instead focus on strengthening engagement through supportive, participant-centered approaches. While sanctions may drive short-term compliance, they are generally less effective in building the kind of trust and collaboration needed for sustained engagement. They can also have unintended impacts on family stability and efforts to move out of poverty. This shift creates an opportunity to lean more into strategies that address underlying barriers and incentivize participation through support services, relationship-building, and individualized engagement. By focusing on what is getting in the way of participation and connecting participants to the right resources, employment service providers may be able to foster more consistent, meaningful engagement over time.

4. If a participant is due to remain in ES sanction for their 7th month on May 1, that case would reset to zero sanctions but remain in sanction but at 5%?

- a. Yes, the sanction count will reset to 0 and May will be the 1st sanction. The sanction amount will be 5% of the cash portion of the grant.
5. Will the STAT/SANC panel still be used, or will it be replaced by the STAT/MFSN panel?
 - a. The STAT/SANC panel will only be used for Mille Lacs Band of Ojibwe Tribal TANF cases. You will get an inhibiting message if information is entered on that panel for any county or Tribal Nation other than Mille Lacs Band of Ojibwe.
6. Assuming there is no longer a 10-day cut off, we will just make sure to cure sanctions by the 15th now? If a financial worker receives the cure on the 15th is that enough time to cure or backdate to 15th?
 - a. There is no change to the 10-day cutoff policy. Most adverse actions, including benefit reductions, still require a 10-day advance notice (see [CM 26.12.03](#)). For curing a sanction, the key factor is the **date the participant comes into compliance**, not the date the worker processes the action. If a participant comes into compliance on or before the 15th of the month, that date is used to determine the effective change. Because curing a sanction results in an **increase in benefits**, it is not considered an adverse action. Therefore, the 10-day advance notice requirement does not apply in this situation.
7. Will or can this affect our Self-Support Index percentages?
 - a. No. The Self-Support Index is an outcome measure that tracks all adults receiving MFIP cash assistance in a quarter and calculates the percentage who have left cash assistance or are working at least 30 hours per week during the quarter three years later. The measure focuses on long-term progress rather than compliance with specific program requirements, so we would not expect a significant direct impact. One potential indirect effect is that, with the policy change, fewer participants may close due to sanction. Because sanctions will now be counted consecutively rather than cumulatively, employment service providers may have more time to engage participants and support them in achieving success.
8. Will sanction scripts be updated for 5/1/26?
 - a. No. We have identified the script "MFIP Sanction NOTES" that will be updated before the end of May.
9. If a unit has no cash portion of MFIP, does that mean the unit will see no reduction in their benefit grant?
 - a. Correct. It will still count as a sanctioned month and, after seven consecutive sanctions, the case will close.
10. Do employment services providers with MAXIS inquiry only have access to the STAT/MFSN panel?
 - a. Yes, ES providers who have inquiry access to MAXIS will be able to see the new MFSN panel.
11. Can we reinstate a case closed for seventh sanction if they start that 30-day ES compliance right after closing? Or will they need to reapply?

- a. No. They must reapply. When a case closes for the seventh consecutive occurrence of noncompliance, the county agency must close the MFIP case and redetermine eligibility for SNAP. The MFIP case must remain closed for one full month. A participant must show compliance with Employment Services for UP TO 30 days, at the discretion of the ES worker.
12. If someone is applying in April for closure on 4/1 due to a 7th sanction, do we need to approve MFIP on 5/1 because of the new policy? Or wait up to the 30 days of compliance and/or when the ES counselor gives the okay?
 - a. Once you enter the compliance date from the ES worker, the case will be eligible if all other eligibility requirements are met. Until then, you will get ineligible results.
13. Is there a 2nd after 7th closure policy? Or do the participants get a full 7 sanctions before closure after every sanction?
 - a. The sanction count resets to zero after compliance. Participants must then receive 7 consecutive sanctions before the case would close again due to sanction limit.
14. What happens if a person comes into compliance after the 15th of the month with regard to when the sanction will be cured?
 - a. The sanction will be cured for the next month.
15. Does good cause have an impact on the new policy?
 - a. Good Cause policy has not changed. Prior to imposing a sanction, determine whether the participant has good cause reason for not complying (see [CM 28.18](#) and [ESM 19.18](#)).
16. Are home visits still required for FSS clients to be sanctioned? This can be difficult at times as some Job Counselors feel it could be dangerous.
 - a. Yes, this policy has not changed. It is a statutory requirement to offer a home visit. See [ESM 17.61](#).
17. If a client is non-compliant with attending the orientation or cooperating with ES month after month, will the sanction remain only 5%?
 - a. Correct. The sanction is 5% of the cash grant for non-compliance. After seven consecutive sanctions, the case will close.
18. If a client closed for 100% sanction for April and then re-applies in April, would they need to meet 30-day compliance with employment services? The policy reads “up to 30-days of compliance”. What happens if they pend until 05/01/26 - do they just get to open then on 05/01/26 and remain ineligible for April or how do we handle these?
 - a. The requirement to be in compliance with Employment Services for up to 30 days remains the same after May 1st.

19. Will current mandatory vendor pay cases be updated/discontinued or is this something workers will have to do? Will clients get a notice that vendor pay is ending?
 - a. Cases with a vendor payment in place received a DAIL Message on the morning of April 15th. These cases will need to be reviewed by the worker and a new approval will need to be made, removing the vendor requirement and imposing the correct sanction amount. The approval notice will no longer show there is a vendor payment in place. As a best practice, a worker should add a WCOM to the notice regarding the cash portion no longer being vendored.

20. If someone closes for 7th month consecutive sanction, but cures the 7th month of sanction by the 15th of the month, does that prevent the need to have to reapply as benefits are restored for the current month?
 - a. If a case comes into compliance before closure, the sanction count resets, the grant will be restored, and a new application is not required.

21. I entered the new panel MFSN but it says that a couple of us don't have access to it, but when I go to STAT/SPAN I can get there by putting an "01" in front of the MFSN panel. Is that the way we need to look at this panel or edit it?
 - a. This is a system issue. Please submit a PF11.

22. What is the purpose of knowing previous sanction months other than ones in the current string of sanction months?
 - a. Overpayments and appeals, for example.

23. If we have a DAIL that says eligibility was auto approved, but the sanction is not showing in the newly approved results, what action should be taken?
 - a. Submit a PF11.

24. What if someone previously requested to be removed at 60 months due to no extension reason?
 - a. Extension policy has not changed, however, participants who were previously ineligible for an extension due to being in sanction in the 60th month or were ineligible for an employed extension due to 2 sanctions in the past 12 months are no longer ineligible due to sanctions.

25. What if they are currently ineligible, is there a way to approve ineligible post-60?
 - a. If a participant is ineligible and those are accurate results, approve ineligible results. If the system is not giving you correct results, submit a PF11 or contact the TSS Help Desk.

26. Our cases that were approved do not show the MFSN panel in the PNLP-PNLE series like you showed.
 - a. If the system is not giving you accurate results, please submit a PF11.

27. If a client is under Child Support sanction and does not receive any cash benefits - there would be no sanction amount - correct?

- a. Correct. The new sanction policy for a child support sanction is 25% of the MFIP Cash Grant. If the family is only receiving the food portion the sanction amount would be zero. The sanction would still count towards the consecutive sanction count.
28. Can you explain the work around regarding the Financial Worker needing to notify ES regarding sanctions?
- a. Until the MAXIS/WF1 interface is updated, the Eligibility Worker will need to notify the Employment Counselor of the consecutive sanction count from MFSN. You can use the [Status Update form DHS-3165 \(DWP/MFIP Status Update Form\)](#) to provide an update to the Employment Counselor.
29. Will the video recording be posted somewhere other than SIR for ES workers who do not have access?
- a. Videos and Q&As will be posted to SIR and emailed to the ES listservs.
30. If a client was closed for 7th month for 04/26, do they have to comply with ES if they reapply for 05/26 MFIP benefits?
- a. Yes, when a case closes for sanction limit, participants must reapply and show up to 30 days of compliance with Employment Services before they are eligible.
31. For all the questions that are being asked to submit a PQ, will the PQ answers be posted?
- a. Yes, submitted PQs will be included in this Q&A if they do not contain case specific information.
32. I am getting NAT error or "you are not authorized user" for MFSN panel & elig results are not showing sanction amount.
- a. To correct this, exit MAXIS and reconnect. If you still receive this message, submit a PF11.
33. Do we still have to reapprove ELIG each month to impose each month or will the sanction auto carry over each month? And will we still get a DAIL to track the sanction or manually track?
- a. If the last approved version included a sanction, then Monthly Issuance will continue to mark the sanction on the appropriate STAT panel until a new approval occurs that cures/removes the sanction. The following PEPR message will be issued when the participant is in their 6th month of sanction and must be closed due to sanction limit for the next month: MF89 - CLOSE MFIP, CASE HAS REACHED THE SANCTION LIMIT.
34. Does full time day care continue for participants in sanction?
- a. There are no changes to how sanctions affect CCAP eligibility. See [ESM 16.30](#).
35. When we send a PF11 to cure CS sanctions, is that to update the MFSN panel or to get the supplement issued?
- a. The case will be reviewed to determine which benefit month a worker would need to change the CS Non-Coop status from an N to Y. Please be specific on what the date of compliance is. The worker will then need to update ABPS in the appropriate benefit month and approve the

eligibility results. MFSN will be updated upon approval and a supplement will be included in the new eligibility results, if appropriate.

36. If a client is not cooperating with child support, can we add this for May?
 - a. Yes, you can still impose May sanctions.

37. Are we reviewing the bulk batch cases and checking to see if the SANC panel is either 0 or 1? What if we see a SANC panel with more than 1 sanction for May?
 - a. As of May 1st, 2026, sanctions will be tracked on STAT/MFSN. Only Mille Lacs Band of Ojibwe Tribal TANF cases will use the STAT/SANC panel. You will receive an inhibiting message if information is entered on this panel and it is not a Mille Lacs Band of Ojibwe Tribal TANF case. If you see a sanction count of more than 1 for May 2026 on the STAT/MFSN panel, submit a PF11.

38. Do participants need to comply for 30 days prior to recommending sanction be lifted?
 - a. No, the policy is that they show compliance for UP TO 30 days. Employment Counselors may use their professional discretion to determine if 30 days should be required, or if a new Employment Plan being developed, for example, is sufficient to establish compliance.

39. If someone has to comply with ES for up to 30 days and they apply April 15th, and you get a status update from ES that they have complied on May 15th, is the start date of their eligibility prorated to May 15th?
 - a. No, if a case closes for sanction limit for 4/2026 and their ES compliance date is 5/15/26, their full benefit will be restored for 5/2026.

40. Is the interface from MAXIS to WF1 not working?
 - a. The interface between the MAXIS MFSN panel and WF1 is not currently working. Follow your agency's procedures to communicate with the ES worker. Information from the MAXIS EMPS panel is still being communicated to WF1.

41. What information will be brought from MFSN to WF1?
 - a. MFSN will have sanction code types, begin/end dates, and consecutive sanction count.

42. Regarding the current workaround for CS sanctions, when will changes to child support sanctions be implemented?
 - a. Child Support sanctions are not currently working correctly. Please submit a PF11 and watch SIR for updates.

43. Trying to approve a post-60 case, previously requested to be removed from the case. Having trouble approving it with that person being ineligible. Trying to approve the sanctioned parent.
 - a. No changes to policy about post 60 removal/extension criteria. Please submit a PQ.

44. What is the impact on participants who were previously permanently disqualified due to sanctions?

- a. Participants who were previously permanently disqualified will be receiving a notice in May 2026 inviting them to reapply.
45. Do sanctions impact the housing grant?
- a. The housing grant is not subject to sanction. If a participant reaches 7 consecutive sanctions and closes, they will no longer receive the housing grant.
46. Sanctions are not being correctly applied when the non-cooperation is entered on a secondary ABPS panel.
- a. This is a known system issue when there is more than one ABPS panel that we are working to resolve. Currently, when there's more than one ABPS panel and the non-cooperation occurs on any other panel than the first one, MAXIS flags that there's a CS sanction but does NOT impose the 25%. You can FIAT (code 21) the sanction percent in as a temporary workaround until this is fixed.