

## CHAPTER 3

# Application and Eligibility for PRC

In drafting a Prevention, Retention and Contingency (PRC) plan, the CDJFS must define eligibility components for receipt of benefits and services. Eligibility components are dependent upon which TANF purpose the benefits and services are intended to serve. Additionally, some components are mandated by federal and state law; others are options that can be employed by the CDJFS. Outlined below are the criteria for a CDJFS to consider when drafting its PRC program. Eligibility for a benefit or service shall be determined based upon information the CDJFS requires, consistent with federal and state law.

### **3000 Access to PRC Services**

PRC services can only be accessed by one of the following methods:

#### **A. Application**

Pursuant to Section 5108.10 of the Ohio Revised Code, an application is required if the benefit or service has a financial need eligibility requirement. Benefits and services provided under TANF purpose 1 (To provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives) or purpose 2 (To end the dependence of needy parents on government benefits by promoting job preparation, work and marriage) require a financial need eligibility requirement.

An application is not required if the benefit or service does not have a financial need eligibility requirement. Benefits and services provided under TANF purpose 3 (To prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies) and purpose 4 (To encourage the formation and maintenance of two-parent families) do not require a financial need eligibility requirement. However, if a CDJFS chooses to impose a financial need eligibility requirement, an application is required.

The CDJFS has the flexibility to design its own application or use the State sample application, JFS 03800, "Prevention, Retention, and Contingency (PRC) Program State Application" located in Appendix E of this guide. The CDJFS also has the flexibility to develop different applications for different services (i.e., Kinship Care, Family Preservation, Youth Work Opportunity) which contain the elements specific to the service(s) requested.

**Note:** With each application, the CDJFS or contractor must ensure that applicants receive information on their rights during the application process. Recommended language can be found in Appendix F of this guide.

## **B. Certification**

Pursuant to Section 5108.10 of the Revised Code, an application is not required if the benefit or service does not have a financial need eligibility requirement. Instead, eligibility shall be certified in accordance with the county's statement of policies adopted under Section 5108.04 the Revised Code. Benefits and services that are provided under purposes 3 or 4 of the TANF program do not have a financial need eligibility requirement. However, if a CDJFS chooses to impose a financial need eligibility requirement, an application is required.

Each CDJFS should assure that the certification information is sufficient to establish the delivery of service. The CDJFS has the option to maintain the certification information or allow the contracting agency to maintain this information. The CDJFS is responsible to ensure that the verification of PRC services issued by the contracting agency is readily available for retrieval when requested for auditing purposes, even if the contracting agency has ceased to exist.

## **C. Non-Administrative Program Operational Activities**

Certain benefits and services do not require an application for assistance as they do not provide a direct service linked to an individual family. Such activities could include employer recruitment, outreach, information and referral, websites, billboards and public service announcements which are considered non-administrative program operation costs.

## **3010 Application Process**

### **A. CDJFS Responsibility**

Eligibility for a benefit or service that is based on financial need shall be determined in accordance with the adopted statement of policies (PRC plan) and based on an application containing information the CDJFS requires. The CDJFS may perform or delegate the application process to a contracting agency. The CDJFS is responsible for monitoring the activities of the contracting agency and the CDJFS maintains responsibility for the actions of its contractors. Legal Brief 02-01, "PRC and Other Non-assistance Eligibility Determinations" issued by the ODJFS Office of Legal Services, provides guidance on CDJFS responsibility in eligibility determinations and can be found on the ODJFS Innerweb.

Pursuant to Section 5108.10 of the Revised Code, when a CDJFS receives an application for benefits or services, the CDJFS shall follow verification procedures established by its PRC plan to verify the facts surrounding the application and to

obtain such other information as may be necessary. On completion of the verification procedures, the CDJFS shall determine whether the applicant is eligible for the benefits or services and the approximate date when the benefits or services are to begin.

The focus of the PRC program is to provide and authorize benefits and services within a specific date of the receipt of a signed application. A ten-day standard of promptness is a suggested time frame that is intended to stress the importance of dealing with PRC applications in an efficient manner. Of course, some emergencies may warrant a speedier disposition such as a utility shutoff or other emergency. In some instances, this time frame will not be met due to unavoidable delays on the part of the applicant or the agency. The county's established application process should ensure fair and equitable treatment of applicants and ensure that a client's needs are met in a timely manner.

If a CDJFS contracts with a provider for issuance of benefits and services under the PRC program, the application responsibilities should be clearly addressed within the contract agreement. All PRC case documentation from the provider should be readily available for auditing purposes.

The CDJFS must ensure that families diverted from OWF assistance receive appropriate information about, and access to, Medicaid, food stamps, child care assistance and other programs that provide benefits that could help the family successfully transition to work. Receipt of assistance from these programs does not affect eligibility for receipt of benefits and services under the PRC program. Because of the tremendous importance of food stamp, Medicaid and child care as supports for working families, it is critical that linkages among these programs is maintained. Accessing these other program benefits could further the goals of TANF. In addition, diverting individuals from programs where they have an entitlement to benefits or to prompt action on a request for assistance could represent a violation of rules in the other program.

To assist counties, a Program Checklist has been added to Appendix G to serve as a tool in identifying risk points where families may potentially lose other program benefits.

## **B. Applicant Responsibility**

An applicant for PRC is responsible for completing all necessary documents, furnishing all available facts and information, and cooperating in the eligibility determination process. We recommend that the CDJFS provide assistance when requested by the applicant.

## **3020 Legislatively Defined Eligibility Components**

There are certain eligibility components of a CDJFS PRC plan which are legislatively defined and are therefore required.

### **A. Privacy Laws**

Each person applying for PRC must provide the CDJFS (or contracted agency) with a social security number, or apply for a social security number. Providing a number is a condition of receipt of assistance.

The collection of this information, including the social security number of each household member, is authorized under Section 1137(a) of the Social Security Act.

The social security number will be used to check information provided by the individual against information held by other federal, state, and local governments; computer matching systems; and program reviews or audits to ensure eligibility for PRC or, to the extent permitted by federal law, to assist in determining eligibility for any other state, federal, or federally assisted program that provides cash or in-kind assistance or services directly to individuals based on need or for the purpose of protecting children. This information will also be used to monitor compliance with program regulations and for program management.

The social security number will be used when contacting appropriate persons or agencies to determine eligibility and verify information that has been provided for the PRC program; for example, income, financial resources, disability benefits or other similar benefits and programs. Such information may affect household eligibility.

The social security number may be used for a felony warrant match; a match of persons in violation of probation or parole by law enforcement agencies; or for purposes of investigations, prosecutions, and criminal or civil proceedings that are within the scope of law enforcement agencies' official duties.

### **B. Citizenship**

In order to receive PRC benefits and services, a member of the AG must be a citizen of the United States or a qualified alien as defined in Section 5101:1-2-30 of the Ohio Administrative Code. See also Section 403(a) of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996.

Section 403(a) of PRWORA states that:

Notwithstanding any other provision of law...an alien who is a qualified alien...and who enters the United States on or after the date of the enactment of this Act is not eligible for any federal means-tested public benefit for a period of five years beginning on the date of the

alien's entry into the United States with a status within the meaning of the term 'qualified alien.'

As a general matter, the bar does not affect an individual who entered the United States before enactment.

There are exceptions to the limit on alien eligibility. First, under PRWORA, aliens who are not qualified aliens are not eligible for any "federal public benefit" unless the "federal public benefit" falls within a specified exception. TANF benefits are generally considered "federal public benefits" and therefore the five year bar on receipt of federal public benefits would apply to newly-arrived aliens who do not meet one of the statutory exceptions. The Department of Health and Human Services has provided its interpretation of "federal public benefit" in 64 FR 41657 (August 4, 1998). A use of TANF funds that might not be considered a "federal public benefit" might include pregnancy prevention services that are available to individuals regardless of financial need.

Additionally, certain benefits may be provided regardless of immigration status. Sections 401(b) and 411(b) of PRWORA state that States may provide certain non-cash Federal or state and local public benefits to any alien. Such benefits are those necessary for the protection of life and safety and include those specified by the Attorney General in a notice dated August 23, 1996 (AG Order No. 2049-96, 61 FR 45985). In the notice, the Attorney General specified the kinds of non-cash government-funded community programs, services or assistance that are necessary for protection of life or safety and for which all aliens continue to be eligible. None of the benefits or services which are available to all aliens may be conditioned on the individual recipient's income or resources. 64 FR 17819 (April 12, 1999). Services that are provided by shelters for homeless or battered individuals that are available to anyone who needs their help would be an example of services that might be funded in part under the TANF program and could be provided to anyone regardless of immigration status.

### **C. Fraudulent Assistance**

Pursuant to section 5101.83 of the Ohio Revised Code and rule 5101:1-23-75 of the Ohio Administrative Code, PRC benefits and services may not be provided to a family that fraudulently receives assistance under the OWF and PRC programs until a member of the assistance group repays the cost of the fraudulent assistance. The CDJFS needs to set up a procedure to ensure that this requirement has been met.

### **D. Notice and State Hearing Requirement**

PRC notices must be in compliance with Chapter 5101:6 of the Ohio Administrative Code. Rules 5101:6-2-02 and 5101:6-2-03 of the Ohio Administrative Code set forth the requirements for issuing notice when an application for public assistance benefits, including assistance under the PRC program, is approved or denied.

A model PRC approval notice has been developed from the JFS 04074 as approved by the Bureau of State Hearings. The form is located in Appendix H. Counties are encouraged to utilize this model form when a member of a PRC assistance group is authorized to receive or is receiving a PRC benefit or service. The form provides a notice to the assistance group of potential categorical eligibility for food stamps, if interested<sup>1</sup>.

The CDJFS must also establish a process in which an applicant found ineligible or adversely affected by a CDJFS or contracting agency determination for PRC benefits is provided with notice in accordance with Chapter 5101:6 of the Ohio Administrative Code. The CDJFS may use the JFS 07334, “Notice of Denial of Your Application for Assistance” or their own county-created denial form. However, if the CDJFS chooses to use their own form, it must be approved by the Bureau of State Hearings pursuant to rule 5101:6-1-01 of the Ohio Administrative Code.

At the time of application, individuals are to be afforded an explanation of their right to request a state hearing. This can be done by providing a copy of the JFS 04059, “Explanation of State Hearing Procedures.” The applicant must have the opportunity to be heard in a state hearing or an administrative appeal. Pursuant to Section 5108.09 of the Ohio Revised Code, PRC hearing decisions are based upon the PRC program plan in effect at the time of the adverse decision, and the county department must provide a copy of the statement of policies and all amendments to the hearing officer.

### **E. Charitable Choice and Faith-Based Initiatives**

Charitable Choice provisions apply when states use faith-based organizations in providing TANF benefits and services to eligible families. Federal regulations (45 CFR 260.34) require that assistance groups have the right to request an alternative provider, and that the assistance groups be notified of this right. Legal Brief 04-01, “Charitable Choice and Faith-Based Initiatives,” issued by the ODJFS Office of Legal Services, provides information on the federal requirements. Office of Family Stability Letter #22, “Charitable Choice and Faith-Based Initiatives” provides further

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<sup>1</sup> Assistance groups authorized to receive or receiving benefits under the PRC program may be categorically eligible for food stamps.

- AGs under purposes 1 and 2 of Temporary Assistance to Needy Families (TANF) who are in receipt of PRC benefits and/or services under a county agency’s PRC plan are conferred with categorical eligibility for food stamps.
- AGs under purposes 3 and 4 of TANF who are in receipt of PRC benefits and/or services under a county agency’s PRC plan must meet income eligibility criteria that requires the AGs gross monthly income to be at or below two-hundred percent of the federal poverty level according to their AG size before categorical eligibility for food stamps can be conferred.

guidance to CDJFS directors about the application of the charitable choice requirement. Both letters can be found on the ODJFS Innerweb.

An assistance group that objects to a faith-based provider must be provided with an alternative provider of services within a reasonable period of time. The alternative provider must be reasonably accessible and be able to provide comparable services.

An assistance group must receive notice of their right to request an alternative provider. The notice must clearly explain the right to be referred to an alternative provider and services that reasonably meet timeliness, capacity, accessibility and equivalency requirements. Notification of these Charitable Choice provisions can be added to self-sufficiency contracts or provided in a notice to PRC applicants and recipients. A sample notice concerning Charitable Choice is located in Appendix I.

## **F. Voter Registration**

The CDJFS, in accordance with Section 329.051 of the Ohio Revised Code, must make a voter registration application available to persons applying for or participating in the PRC program. This section applies to county agencies and those entities with whom the county contracts. Contracted agencies can provide the completed voter registration forms to the CDJFS who in turn should provide them to the Board of Elections.

## **3030 Locally Defined CDJFS Eligibility Components**

### **A. Assistance Group Composition**

In Ohio, all families are served through defined assistance groups. Assistance groups participating in the OWF program are defined differently from those obtaining services under the PRC program.

#### **1. PRC Benefits and Services: Purposes 1 and 2 of TANF**

Based upon Title IV-A federal regulations and state law, an eligible family assistance group must, at a minimum, consist of:

- A minor child who resides with a parent, specified relative, legal guardian or legal custodian (a child may be temporarily absent from the home provided certain requirements are met);
- A pregnant individual with no other children; or
- A non-custodial parent who lives in the state, but does not reside with his/her minor child(ren).

A county may create one definition of assistance group for all benefits and services included in the county PRC plan. However, this approach limits county flexibility and service delivery. A more flexible approach is to identify eligible assistance

groups and limitations for each type of service the county intends to provide. The following list includes considerations for a CDJFS in establishing eligible assistance groups:

- An eligible assistance group may consist of a minor child residing with a parent, specified relative, legal guardian or legal custodian and other members of the household (who may or may not be related to the minor child) who may significantly enhance the family’s ability to achieve economic self-sufficiency.
- A CDJFS may provide PRC services to more than one PRC assistance group even when both PRC assistance groups contain the same child.

*The dollar value provided to one PRC assistance group does not necessarily have to count against the dollar value provided to another PRC assistance group containing the same child.*

- A CDJFS may create several categories of PRC assistance groups to receive different benefits and services (for example, a CDJFS may wish to identify the types of services and limitations for a non-custodial parent PRC assistance group that is different from those established for the kinship care PRC assistance group).
- A CDJFS could identify a different set of services and limitations for an employed PRC assistance group.
- A CDJFS may also provide different benefits and services designed to meet the different needs of the same assistance group. For example, a county agency may:
  - ? create financial caps or service limitations for services or short term financial help to a defined assistance group;
  - ? limit or cap some services/benefits and not others; or,
  - ? set monthly, quarterly or yearly limitations for providing services and financial caps.

A child may be “temporarily absent” yet the child and his/her family may still qualify for PRC benefits and services. “Temporary absence” has the same meaning for the PRC program as it does for the Ohio Works First program as set forth under Section 5107.10 of the Ohio Revised Code and Rule 5101:1-3-04 of the Ohio Administrative Code. Under Ohio Works First, pursuant to Rule 5101:1-3-04, the absence of a member of the assistance group is temporary if the assistance group member has been absent for no longer than 45 consecutive days, location of the absent individual is known, there is a definite plan for the return of the absent individual to the home, and the absent individual shared the home with the assistance group prior to the onset of the absence. Rule 5101:1-3-04 also sets forth exceptions to the requirement that the

assistance group member be absent for no longer than 45 consecutive days. Most relevant to PRC is the situation where a child is removed from the home by the public children services agency due to abuse, neglect and dependency if the agency indicates that there is a reunification plan to return the child to the home within six months.

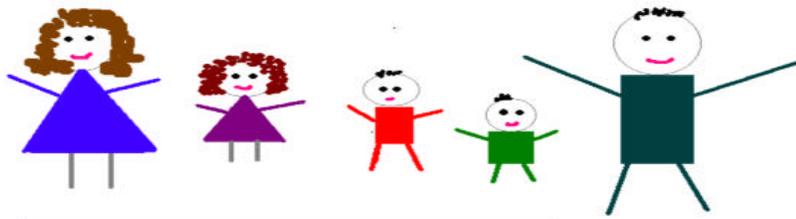
2. PRC Benefits and Services: Purposes 3 and 4 of TANF

The exception to the above assistance group composition requirements is in meeting purposes 3 and 4 of TANF. Neither purpose 3 nor purpose 4 is limited to needy families. Under either of these two purposes, a county could use federal TANF funds (but not Maintenance of Effort funds) for PRC services to serve non-needy families or individuals.

3. Assistance Group Scenarios

The following examples are designed to convey various scenarios of assistance groups, but do not exhaust all the potential arrangements.

**FIGURE 1** -- Mother and three children in an OWF Assistance Group. One child and non-custodial father in PRC Assistance Group.



OWF AG: MOM AND THREE CHILDREN

PRC AG: DAD AND ONE CHILD

**FIGURE 2** -- Children in temporary custody and living with grandmother while their mother remains in open OWF assistance group.

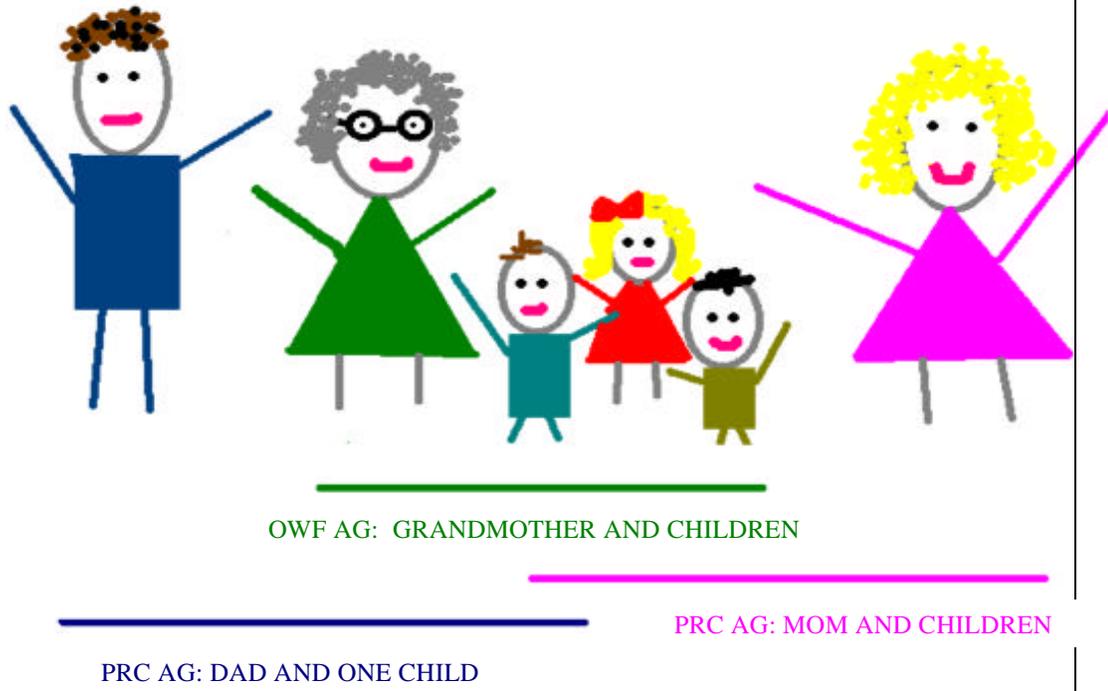


PRC AG: GRANDMOTHER AND CHILDREN

OWF AG: CHILDREN ONLY

OWF AG: HELD OPEN WHILE CHILDREN ARE IN PLACEMENT

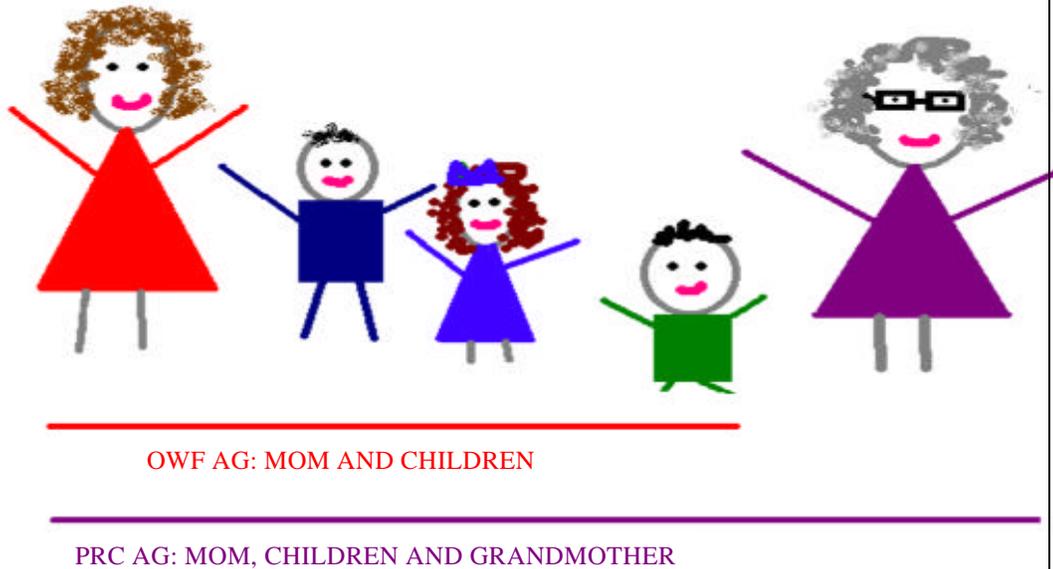
**FIGURE 3** -- Grandmother with three children in her OWF Assistance Group. Mother and three children in PRC Assistance Group. Non-custodial father and one child in PRC Assistance Group.



**FIGURE 4** -- Custodial father with two children in PRC Assistance Group. Non-custodial mother in PRC Assistance Group.



**FIGURE 5** -- The children live at home with mother. Grandmother lives in the home.



## **B. Economic Need**

Eligibility for PRC benefits and services intended to meet purposes 1 and 2 of TANF is dependent upon the AG's demonstration and verification of need (income and/or resource standard). In order for eligibility to be determined, the income of the AG must be compared to the income need standard established by the CDJFS. The AG income must be equal to or less than the standard.

Under purposes 3 and 4 of TANF, families and individuals may receive PRC benefits and services without regard to need. For programs under purposes 3 and 4 of TANF, a CDJFS may establish a standard of need to target certain populations.

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (implementing Temporary Assistance for Needy Families, or TANF) did not define a need standard or income cap to be used when determining eligibility for TANF non-assistance benefits and services. The preamble to the federal TANF regulations, 64 Fed. Reg. 17826 (April 12, 1999) states the following:

*Comment:* A few commenters, including two advocacy groups, recommended that we establish a ceiling on the income standards used by a State to ensure

that basic MOE expenditures are appropriately targeted to help families most in need.

*Response:* The proposed rules were silent on this issue. However, we do not think it is appropriate for us to establish a ceiling in the final rule. TANF leaves this responsibility to the States. We hope that States will establish reasonable income standards to ensure that expenditures are targeted to families most in need.

While Congress did not explicitly provide for an income cap under TANF, we believe that Congress was very interested in the ways States are targeting their resources to help families most in need find work and move toward self-sufficiency. For example, section 404(d)(3)(B) of the Act requires that TANF funds transferred to title XX programs must be used only for programs and services to children or their families whose income is less than 200 percent of the income official poverty line (as defined by the Office of Management and Budget) applicable to a family of the size involved. Thus, we re-emphasize our hope that States will target their resources in ways that help needy families and support the goals of the program.

The preamble's explicit reference to a need standard of 200% of the federal poverty level for Title XX transfers strongly supports an interpretation of the federal law that Congress considered a reasonable definition of "needy" to be at or below 200% of the federal poverty level. As a result, ODJFS has recommended that counties adopt a need standard not to exceed 200% of the federal poverty level in most situations.

There may be instances where a standard of need that exceeds 200% of the FPL might be appropriate, but such a determination should be accompanied by a logical explanation or justification explaining why the selected standard of need is appropriate and reasonable in those circumstances.

Keeping in mind the implications of the above preamble language and federal regulations, a CDJFS still has many options in defining economic need. Means tests such as income level, percentage of poverty, relationship to the state's median income or participation in other means tested programs such as Food Stamps or Medicaid can demonstrate economic need. The county may also use different economic need tests for different types of benefits and services. However, simply needing a service like utility shut-off prevention, transportation or training does not constitute a definition of economic need. Each CDJFS has a responsibility to ensure that their expenditures are targeted to families most in need and reflect the intent of federal goals for the program.

Examples of varying percentages of economic need standards for specific benefits and services are reflected in the ODJFS Federal Poverty Guideline (FPG) Measure chart. The formula that ODJFS uses for determining the monthly amount is:

$Annual\ FPG \div 12\ months\ (rounded\ up) = 100\% \text{ monthly } FPG$   
 $100\% \text{ annual } FPG \times \% \text{ FPG } (rounded\ up) = \text{Monthly amount/AG size.}$

The chart can be accessed under the Cash Assistance Manual located at the ODJFS web site. (See “CAM Desk Aids” Section.)

### **C. Countable Income**

A CDJFS can decide what types of income it will consider and whether or not that income is available when determining need. A CDJFS has the flexibility to specify the income limits it will use when determining eligibility for its PRC program. The total gross income, both earned and unearned, of all members of a PRC AG may be counted when determining PRC eligibility. The CDJFS may opt to include or exclude all income which is normally exempt or disregarded when determining eligibility for OWF or Disability Financial Assistance (DFA), Supplemental Security Income (SSI) and/or food stamps.

There are some income and benefits which are federally required to be excluded from all assistance programs when determining income eligibility. Rule 5101:1-24-20 of the Administrative Code addresses the issue of excluded income.

#### **1. Earned Income**

Earned income is income for which some type of labor or service is performed. The following are examples of earned income which a CDJFS may count at its discretion. This is not intended to be an all-inclusive list:

- earnings from work as an employee
- earnings from self-employment
- strike benefits (if striker is required to perform services in order to receive them)
- training allowances

#### **2. Unearned Income**

The following are examples of unearned income which a county may opt to consider. This is not intended to be an all-inclusive list:

- RSDI Benefits
- alimony and child support
- Veteran Administration benefits
- Workers’ Compensation benefits
- lump-sum payments
- unemployment benefits
- pension and retirement benefits
- strike benefits
- investment income
- rental income

## **D. Resource Limits**

A CDJFS may choose to specify a resource limit for purposes of determining eligibility. The county may want to specify what type of resources they will include as available to meet the need of an AG. The county may set resource limits for different services. If a CDJFS chooses to specify a resource limit, they must provide language within their PRC plan which stipulates the resource requirement(s).

## **E. Verification**

For cases in which verification cannot be accurately obtained, implementation of practices that are reasonable and prudent should occur. A signed JFS 07341, "Applicant/Recipient Authorization for Release of Information" should be obtained from the applicant for an inquiry. Once the release is received, the CDJFS shall assist the AG in collecting the verification.

In accordance with Section 5108.05 of the Revised Code, each county department of job and family services must have fair and equitable procedures for the both of the following:

- The certification of eligibility for the benefits and services that do not have a financial need eligibility requirement;
- The determination and verification of eligibility for the benefits and services that have a financial need eligibility requirement.

There is a discussion in the preamble to the final TANF regulations (64 FR 17827, April 12, 1999) which states:

...we would note that 45 CFR 92.42 requires states to keep records to document claims and that states should, therefore, have and keep adequate records on eligibility.... States have an inherent interest in ensuring the integrity of their expenditures. Should a state learn of any material deficiency in its method for determining eligibility, we anticipate that the state would rectify it immediately, so that funds for services are properly benefiting members of eligible families.

If a CDJFS chooses to accept self-declaration of income from an applicant applying for PRC assistance, it is the responsibility of the CDJFS to ensure that the client statement is documented in the case record. Therefore, a CDJFS that chooses to accept self-declarations must state this policy within its PRC plan and document such case activity.

## **F. Residence**

The U.S. Supreme Court, in Saenz v. Roe, 526 U.S. 489 (1999), has held that the length of time a person has lived in a place cannot be the basis to deny government assistance benefits. ODJFS policy is to treat all OWF applicants/recipients the same regardless of the length of time the assistance group has lived in the county. Therefore, durational residency requirements are discouraged in the county PRC program.

## **G. Community Resources**

The availability of resources within the local community may be explored prior to the authorization of PRC. A PRC AG may apply for and use any program, benefit or support system which may reduce or eliminate a presenting need.

Personnel authorizing PRC should be aware of any community resources that could assist a family in need of immediate services. Knowledge of available resources is necessary to advise applicants of other services within the community that may assist with meeting the emergent need(s). The PRC sample application in Appendix D provides a section for written documentation of agency attempts to locate and utilize resources within the community.

## **H. Case Record Composition**

The application and any other information gathered during the eligibility determination process should be kept in the ongoing OWF, Medicaid, and/or food stamp AG record. If the AG is not in receipt of ongoing OWF, Medicaid, and/or food stamp assistance, a separate AG folder should be maintained for the PRC application and related verifications. In addition, PRC benefits and services provided to non-custodial parents should be maintained in a separate AG record.

The AG record should contain sufficient documentation of the case activity on the PRC application, including an explanation of unexpected or unavoidable delays in processing the application.

## **I. Overpayment Procedures**

A CDJFS may choose to stipulate overpayment determination policies and repayment schedules in its PRC plan. Methods of repayment may include regular payments, community service hours (as determined by dividing the PRC payment by the current federal minimum wage), waiting until the minimum time period for receipt of that service has expired, or a combination of any of the above.