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OWF/PRC Guidance Letter No. 1

TO: Directors, County Departments of Human Services
Directors, County Public Children Services Agencies
Directors, Child Support Enforcement Agencies
Regional Account Managers

FROM: Jacqueline Romer-Sensky, Director

Handwritten signature of Jacqueline Romer-Sensky in black ink.

SUBJECT: OWF/PRC Guidance Letter No. 1

The Ohio Department of Human Services (ODHS) is issuing the first of a series of guidance letters related to Ohio Works First (OWF) and Prevention, Retention and Contingency (PRC) programs. Forthcoming letters will obsolete the four Ohio Works First (OWF) series of letters, the Work Activities Guidance Letters, and certain other memorandums/letters dealing with OWF and/or PRC. We will then update, revise and reissue those letters under this new series of letters. This is being done so that all pertinent guidance material is easily referenced.

Passage of Ohio House Bill 408 created the PRC program to serve low income families who may or may not currently be receiving OWF cash assistance. With declining caseloads, time limits, and available funds, counties need to design PRC programs that encourage participants to become and remain self-sufficient.

This initial guidance letter was developed due to the issuance of conflicting information, lack of accurate guidance and the issuance of final federal regulations. We strongly urge you to review your agency's current PRC plan and make appropriate amendments to be consistent with the interpretations of federal and state law contained in this guidance.

Questions regarding this document are to be directed to your regional Account Manager.

c: County Commissioners Association
OHSDA
PCSAO
Cheri Walter
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Deputy Directors
Technical Assistance Managers

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Services for OWF and PRC Families

I. Introduction

Passage of Ohio House Bill 408 created two programs designed to serve the needs of low income families in Ohio. The Ohio Works First (OWF) program encourages family self-sufficiency through employment while it meets temporary needs through cash assistance. It provides an administrative framework for providing services to families while on cash assistance. The Prevention, Retention, and Contingency (PRC) Program is designed to serve low income families who may or may not currently be receiving OWF cash assistance. It is a tool for counties to encourage families to attain and retain employment, prevent dependency and promote family stability within the context of community priorities and needs. PRC makes it possible to meet the needs of low income families through ongoing services and/or one-time-only cash payments so that they do not need OWF cash assistance.

The PRC Program provides counties with the flexibility to determine what programs, services, and expenditures are necessary to promote the goals of the community and in serving its low income families with children. It allows counties to design programs and services to meet community needs. The county can choose the priorities, services, resource allocations, and funding mechanisms. Both of these programs define services for needy families that are supported by funds made available through the federally funded Block Grant Program entitled, Temporary Assistance for Needy Families (TANF). TANF was created by The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA).

OWF letter #1 provides direction for structuring a PRC program, determining services and providing short-term emergency assistance. This guidance letter does not obsolete OWF letter #1. This guidance letter was issued to improve county awareness and utilization of the provisions of OWF and PRC to serve a community's low income families. This guidance letter contains two specific corrections to OWF letter # 1. (See Section II. **A.** of this guidance.) Additional corrections to OWF letter #1 will follow in future guidance letters. This letter describes provisions, activities, and interpretations that the Ohio Department of Human Services (ODHS) supports as consistent with state and federal laws and regulations. The design of the local PRC program is a county opportunity and responsibility. This letter is not intended to replace the priorities of county commissioners, the legal advice and/or interpretation of federal and state statutes by the county prosecutor, or the financial advice of county auditors.

This document contains five sections designed to summarize the major federal and state program requirements and to provide specific county examples of allowable PRC programs and service. These sections are: Introduction, Federal and State

Requirements, Management Considerations, Covered Services, and Reference.

This guidance will be shared with counties via direct mailing, a workshop at the Ohio Human Services Director's Conference, regional workshops and will be placed on the InnerWeb and Internet. If you have questions or comments about this document please contact your account manager. The descriptions and illustrations in this document are intended to describe the possible uses of PRC and are not intended to be a complete list. As more is learned from county experiences, ODHS will share examples of successful programs.

II. Federal and State Requirements

In its effort to promote economic self-support, a county may define the type and duration of services funded through the PRC Program to needy assistance groups. The county service definitions for PRC need not be restricted either by federal or state time limits placed on OWF cash assistance or the restrictions placed on "One-Time-Only" cash assistance. Outlined below are the federal and state parameters that counties must use in defining the services, assistance group, and need in a PRC Plan.

A. Correction to OWF Letter #1

Sanctioned Families: The Guidance Criteria A4 attached to OWF Letter #1 was in error when it stated HB 408 precluded PRC services for a sanctioned OWF assistance group. A county may provide PRC services to assistance groups that have been sanctioned under OWF. PRC services can be helpful in resolving issues regarding the sanction, such as continuing family stability services for the assistance group. The county should avoid activities that are in conflict with the State TANF Plan. For example, It may be inappropriate to replace a sanctioned benefit with a cash payment in the form of one-time-only cash assistance. However, a one-time-only cash benefit or services might be appropriate if it assists a sanctioned individual in gaining or retaining employment.

Economically Needy: Throughout the PRC State Model that is attached to OWF Letter #1, 150% of the Federal Poverty Guidelines is used to define the economic need. The definition of economic need is county determined. (See page 3 of this document for further details on economic need.) Therefore, in the PRC State Model, wherever 150% of the Federal Poverty Guidelines is used, it should be underlined (underlining delineates where the county has options).

B. General Requirements for PRC eligibility

The purpose of the TANF block grant and HB 408 is to assist economically needy families to achieve self-sufficiency. Counties must define at a minimum the following

elements in their PRC plans to provide services and one-time only cash assistance under PRC for needy families.

Assistance Group - Assistance group is the technical term used to describe families. The county must define the assistance group in need of service; and, is free to define who is a member of the assistance group. It may choose to help other assistance group members, such as a non-custodial parent, who could significantly enhance the assistance group's ability to achieve economic self-sufficiency. The definition of the assistance group for the purposes of PRC need not be consistent with the OWF standard filing unit. The assistance group must contain a minor child or a pregnant individual. A minor child means an individual who has not attained 18 years of age or has not attained 19 years of age and is a full-time student in a secondary school (or in the equivalent level of vocational or technical training).

Economically Needy - The county must define economic need. The county has many options in defining an economic need for assistance groups and services. It could use a means test such as an income level, percentage of poverty, or relationship to the state's median income. Enrollment in other means tested programs such as Food Stamps or Medicaid can constitute economic need. A definition of need could include circumstances clearly related to economic deprivation such as homelessness or disasters such as flood, fire, or earthquake. Needy assistance groups could include those living in specified areas which contains a circumstance of high unemployment, poverty, or disaster. A Federal Disaster area or Empowerment Zone are examples of targeted areas. A county may combine need criteria. For instance, a county may specify a targeted area or circumstance and an income limit. Simply needing a service like substance abuse counseling, transportation, or training does not constitute a definition of economic need.

Other Eligibility Criteria - A county may develop its own policies governing the program. The policies shall establish or specify eligibility requirements, assistance or services to be provided under the program administrative requirements, and other matters the county department determines necessary. This includes issues involving county residency and assistance group size. A county may limit the types of services it will provide when an economic need is determined. The county may use different economic needs tests for different types of services.

PRC Application - The county is required by HB 408 to develop an application for PRC . Counties may design their own application; adopt the state model application; or choose to use an existing document or application as specified in their PRC Plan. The county application should include sufficient information for the county to determine and record the circumstances of the applicant needing the service. A county can determine the level and type of documentation required by applicants for services. Administrative activities, however do not require an application. Outreach activities such as employer

recruitment or enrollment outreach to needy individuals, or public service announcements are administrative activities not associated with an application for direct services. For further guidance on requirements governing the PRC application see ORC 5108.10.

Written Policy - The PRC plan must be supported by written county policies in compliance with HB 408. Section 5108.8 states that “The policies shall establish or specify eligibility requirements, assistance or services to be provided under the program, administrative requirements, and other matters the county department determines necessary.” Written policy should be adequate to support a state hearing decision under ORC Section 5108.9. The county PRC plan and all amendments to the plan must be submitted to ODHS in accordance with OWF Letter #1. Future amendments to the PRC plan cannot be retroactive.

Reporting Requirements - The Final Federal Regulations published on April 12, 1999 outline some additional reporting requirements for PRC and OWF, effective October 1, 1999. As ODHS develops policy and reporting mechanisms for these requirements, it will publish additional policy guidance and regulations.

C. Limitations and Prohibitions Affecting PRC

Federal Definition of Assistance - For PRC, counties may not provide any activity, service or benefit that falls within the TANF definition of assistance. Counties may only provide services or assistance meeting the TANF definition of assistance under the OWF Program. Section 260.31 of the Final Federal Regulations published on April 12, 1999 defines ‘assistance’ as follows:

- “(a)(1) The term ‘assistance’ includes cash, payments, vouchers, and other forms of benefits designed to meet a family’s ongoing basic needs (i.e., for food clothing shelter, utilities, household goods, personal care items, and general incidental expenses).
- (2) It includes such benefits even when they are:
 - (i) Provided in the form of payments by a TANF agency, or other agency on its behalf, to individual recipients; and
 - (ii) Conditioned on participation in work experience or community service (or any other work activity under Sec. 261.30 of this chapter).
- (3) Except where excluded under paragraph (b) of this section, it also includes supportive services such as transportation and child care provided to families who are not employed.”

The text of paragraph (b) referenced in Section 260.31(a)(3) can be found in this document in Section III B. This prohibition does not preclude providing assistance for

non-recurrent, short-term needs that include food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses. See Section III. B. of this document for further information.

Teen Parents Education - Unmarried teen parents with a child more than 12 weeks old receiving PRC services must either be in high school or participating in activities aimed at enabling the teen to receive an equivalency degree. (See Title IV, Social Security Act, Sec 408(a)(4).)

Teen Parent Residency - All minor parents or pregnant minors receiving PRC must reside in an adult supervised setting. (See Title IV, Social Security Act, Sec 408(a)(5)/Ohio Revised Code Section 5107.24/Ohio Administrative Code 5101:1-3-03(B)(7).)

Medical Services - A county may not provide medical services under PRC except for pre-pregnancy family planning services. Generally, ODHS has interpreted this provision to allow for work readiness services such as pre-employment physicals and substance abuse assessment that are generally not reimbursable under Medicaid. It may also allow for safety glasses needed for employment that are not reimbursable through Medicaid. It is the opinion of ODHS that it does not allow for the payment of health care premiums. If there are health care related services that are necessary for employment and are not covered by the Managed Care plan, consult your Account Manager. Counties that intend to provide drug/alcohol and mental health treatment services through this funding mechanism should check with their County Prosecutor to assure that the services provided are not considered medical services. Whether or not the individual in question is actually on Medicaid is not the issue. The issue is whether the service provided to this individual is a Medicaid covered service. The ODHS Office of Medicaid will issue guidance on Medical Services in the near future. (See Title IV, Social Security Act, Sec 408(a)(6).) Reference the 7/28/98 from Arnold Tompkins and Luceille Fleming to all County Commissioners entitled, "State/Local Alcohol and Other Drug Service Enhancement".

Misrepresentation - A person found to have fraudulently misrepresented residence in order to obtain assistance in 2 or more states is ineligible for 10 years. (See Title IV, Social Security Act, Sec 408(a)(8)/ Ohio Administrative Code 5101:1-3-29.)

Receipt of Fraudulent Assistance - An assistance group is ineligible for OWF or PRC until a member of the assistance group repays the cost of fraudulent assistance (See Ohio Revised Code Section 5101.83).

Fugitive Felons - Fugitive felons and probation and parole violators are ineligible to receive federally funded assistance. (See Title IV, Social Security Act, Sec 408(a)(9)/ Ohio Revised Code Section 5107.36.)

Conflicts with State Plan and Federal Law - The county PRC plan may not conflict with the Title IV - A State Plan, Ohio Revised Code, or federal law. (See Ohio Revised Code Section 5108.02.)

III. Management Considerations

This section discusses the management issues that counties may want to consider when structuring a program of service delivery under OWF and PRC. These issues are important to examine as county OWF caseloads decline, and the county continues to have many needy assistance groups requiring supportive services to avoid economic dependency. As caseloads decline, an increasing proportion of assistance groups on OWF are child-only cases.

A. OWF

Under OWF, a county can provide OWF cash assistance and other services that are necessary to promote individual self-sufficiency of OWF participants. These services are to be listed in the Self-Sufficiency Contract as assistance or services that the CDHS (PCSA and/or CSEA) is providing to the assistance group. Since they are already in receipt of federally defined assistance, the OWF assistance group may receive other help such as a transportation allowance that exceeds the one-time-only definition of assistance.

B. PRC

Under PRC, a county can provide services that promote individual self-sufficiency. The county may serve both OWF participants and/or other needy assistance groups that it specifies in its PRC plan. Under PRC, a PRC or OWF assistance group may receive ongoing services without cash value. A PRC assistance group may not receive financial help that constitutes the federal definition of assistance (See Section II. C. of this document). Only OWF assistance groups may receive a federally defined form of assistance. If a PRC assistance group needs a form of federally defined assistance, it must qualify for and be enrolled as an OWF assistance group to receive the federally defined assistance.

Section 260.31 of the Final Federal Regulations published on April 12, 1999 permits the following services and benefits to be provided under PRC (Federal Register, page 17880):

“(b)...

(1) Nonrecurrent, short-term benefits that :

- (i) Are designed to deal with a specific crisis situation or episode of need;
- (ii) Are not intended to meet recurrent or ongoing needs; and
- (iii) Will not extend beyond four months.
- (2) Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);
- (3) Supportive services such as child care and transportation provided to families who are employed;
- (4) Refundable earned income tax credits;
- (5) Contributions to, and distributions from; Individual Development Accounts;
- (6) Services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support; and
- (7) Transportation benefits provided under a Job Access or Reverse Commute project, pursuant to section 404(k) of the Act, to an individual who is not otherwise receiving assistance.
- (c) The definition of the term assistance specified in paragraphs (a) and (b) of this section:
 - (1) Does not apply to the use of the term assistance at part 263, subpart A, or at part 264, subpart B, of this chapter, and
 - (2) Does not preclude a State from providing other types of benefits and services in support of the TANF goal at Sec. 260.20(a)."

Please review the federal regulations governing these provisions. There are some important qualifiers. For example, supportive services such as transportation and child care that last longer than 4 months will be considered assistance under the federal definition for unemployed PRC assistance groups.

C. Child-Only OWF Assistance Groups

Self-sufficiency contracts are not required for child-only OWF assistance groups. Therefore, a county wishing to provide non-assistance service delivery to child-only OWF assistance groups must use the PRC plan for this purpose.

D. Loans

Loans provided under OWF or PRC have special requirements. At a minimum, a loan repayment constitutes program income. As such, recovery would have to be offset against expenditures. Some County Prosecutors have raised questions about loan programs pursuant to Ohio Revised Code Section 321.23. .

E. Transportation

Transportation services may be provided on an ongoing basis to PRC assistance groups that have an employed adult. Transportation services to PRC assistance groups without a working adult may not exceed the parameters outlined in Section 260.31 (b)(1) governing 'non-recurrent, short term benefits.'

TANF-ACF-PA-98-5 federal policy guidance requires transportation expenditures be distributed in a manner which would comply with OMB Circular A-87 cost allocation principles. See your Regional Fiscal Supervisor for applying OMB Circular A-87 cost allocation principles.

ODHS neither endorses nor prohibits the purchase of automobiles for needy assistance groups under OWF or PRC. A county agency should consult the County Commissioners and the County Prosecutor to determine local priorities and legal interpretations.

F. Management Options

Counties may provide services to OWF participants through either the self-sufficiency contract or through the PRC plan. Many counties choose to provide services for OWF assistance groups but not for other needy assistance groups. Services provided for OWF only participants must either be identified in the Self-Sufficiency Contract of eligible OWF assistance groups or specified in the PRC Plan of the county.

Many counties may opt to provide a service under PRC. Services provided under PRC must be specified in the county's PRC plan. The PRC plan identifies the services and categories of eligible participants. Some counties may serve only non-OWF assistance groups through PRC. A county can serve both OWF and non-OWF participants through PRC if they are specified as among the eligible recipients. If OWF participants are specified as among the eligible recipients in a PRC Plan, a county is not required to specify the service in the Self-Sufficiency Contract.

In general, any service available through PRC to non-OWF families must be made available to OWF families who also need the service.

G. A Continuum of Services

A county may want to build a continuum of services as assistance groups move off OWF cash assistance to employment. The assistance group may continue to need supportive services even though they are employed. A county may want to build a continuum to serve needy assistance groups regardless of their OWF status. Early Start is an example of a service designed to be available to needy assistance groups regardless of their OWF status.

The county can build a continuum of services in two ways:

1. The county could provide services under OWF through the self-sufficiency contract and then provide the same service under PRC once they leave OWF cash assistance.
2. The county could provide the service under PRC so that it covered both OWF assistance groups and other needy assistance groups.

H. Financial Management

Counties have many tools to manage the provision of services within their allocations. Specifying the services and the eligible assistance groups in the PRC plan are critical tools in this process. Counties should consider using language in the PRC plan that limits the provision of service based on the availability of funds to cover the service. Some counties use contracts with service providers as a way to allocate funds for a specific service to specific needy assistance groups.

IV. County Provided Services

The service categories in this section include examples of services that counties are providing under OWF or through their County PRC programs. These examples are not intended to limit options available to counties, but are included to illustrate the scope of opportunities for local innovation. This section organizes the County Provided Services into the following categories:

- A) Employment/Training Services - This section includes training, job development / job placement, assessment/ testing, employment support services, and job related expenses;
- B) Transportation
- C) Prevention/ Diversion Services - This section includes Early Start, School Readiness, diagnostic services, diversion services and others;
- D) Emergency Assistance/Disaster Relief;
- E) Child Protective Services; and
- F) Child Support Services.

A. Employment/Training Services

Assessment and Testing

Services to assess the educational, functional, emotional, literacy, interests, aptitude, and specific skills for the purpose of assisting a TANF eligible participant secure treatment, education, training, licensing, or certification necessary to secure employment.

- Comprehensive vocational assessments (aptitudes, interests, etc.)
OWF and PRC - Montgomery County
- Literacy assessments

- OWF and PRC - Hamilton County
- Specific Occupation aptitude assessments
 - OWF - Montgomery County
 - PRC - Washington County
- Pre-employment drug screening for employers
 - PRC - Fulton County
- Testing for State licenses, board certification, Commercial Drivers License, etc.
 - PRC - Medina County
- Career assessment/testing
 - PRC - Geauga County

Education and Training

Services that provide instruction to eligible participants in literacy, basic skills, occupational skills, resume preparation, interviewing skills, job readiness training, job search skills, etc. and necessary training materials and expenses. These services may be provided under either or both OWF and PRC. Listed below are some of the types of services provided by counties:

- Training for women in non-traditional careers (construction, manufacturing)
 - OWF and PRC - Washington County
- Short term education expenses, books, manuals, tuition
 - OWF and PRC - Allen, Medina Counties
- Work Experience Program - without with observation for hard to place clients (If done under PRC it may not include a monthly subsidy)
 - OWF and PRC - Hamilton County
- Job Readiness training (work habits, attitude, dress, etc.)
 - OWF and PRC - Montgomery County
 - PRC - Geauga County
- Job Clubs
 - OWF and PRC - multiple counties
- Literacy assessments and tutoring
 - OWF and PRC - Hamilton County
- Skill training
 - OWF and PRC - Washington County
- Job Coaching
 - OWF and PRC - Washington, Montgomery Counties
- Adult Basic Education and GED preparation
 - OWF - Montgomery County
- Selected occupational training for specific employers/industries (pharmacy, hospitals, hotels, office skills, computer literacy, etc.)
 - OWF and PRC - Washington County
 - OWF - Montgomery County
- Community College career advancement and retention, career guidance
 - OWF and PRC - Clark County, Hamilton County

Employment Support Services

Services to identify TANF eligible participants' barriers to securing and maintaining employment and the provision of services to alleviate the barriers. These services may be delivered in home, in an agency setting or in the workplace. Service options include (but are not limited to), domestic violence services, family stability counseling/intervention, employment counseling, job coaching, job retention services, follow-up services after placement, short-term child care, and drug/alcohol and mental health treatment. See Section II. C., "Medical Services" for more information.

- Drug/alcohol abuse, mental health treatment services (i.e. services that are not covered under Medicaid.)
 - PRC - Shelby, Geauga
 - OWF and PRC - Hamilton County
- In-home support services to identify barriers to employment
 - PRC - Geauga County
 - OWF - Montgomery County
- Employment counseling
 - PRC and OWF - Geauga County
- Intensive case management for hard-to-serve clients
 - OWF and PRC - Hamilton, Montgomery Counties
- Job coaching
 - PRC - Washington County
- Retention services after job placement (24 hour availability)
 - OWF - Hamilton County (PRC?)
- Domestic Violence services
 - PRC - Shelby County
- Case management and service brokerage
 - OWF and County funds - Montgomery County
- In-home services to support self-sufficiency and family stability
 - PRC - Geauga County
- Assistance with SSI application for hard to serve
 - OWF and PRC - Hamilton County
- Job retention follow-up services
 - OWF and PRC - Montgomery and Hamilton County
- Staff training for alcohol/substance abuse awareness (This is considered an administrative activity not a direct service.)
 - PRC - Ashland County
- Short-term child care
 - PRC - Greene County

Job Development/Job Placement Services

Services to link TANF eligible participants with job openings through the matching of

employers hiring needs with job seekers, through employer recruitment, job placement services, automated data banks of job openings and applicants, work experience opportunities, on-the-job training slots, recruiting agreements with employers, Job Fairs, referral services, etc. In developing these services please consult your Regional Fiscal Supervisor on what portion of these costs can be charged to administrative activities.

- Direct job placement purchased services
 - OWF and PRC - Hamilton County
 - OWF - Montgomery County
- Combining work experience with mental health treatment services
 - OWF and PRC - Hamilton County
- Employer recruitment services (applicant screening, interviews, referrals, etc.)
 - OWF and PRC - Montgomery County
 - PRC - Geauga
- Job Bank-automated data banks of job openings, applicants, matching, referrals
 - OWF, County funds, private sector funding - Montgomery County
- Job Fairs
 - OWF and PRC - multiple counties
- Job referral services
 - OWF and PRC - Washington County
- Exclusive recruiting agreements with employers
 - OWF and PRC - Montgomery County

Job-Related Expenses

These services assist OWF and/or PRC participants in obtaining and/or maintaining job employment through the county purchase of supplies, clothing, tools, etc. These may include, but are not limited to:

- Dry cleaning of job related clothing and/or uniforms.
- Purchase of special tools, e.g. wrenches for a car mechanic
- Payment for special training class or seminar
- Purchase of work boots, tool belts, etc.

Agencies considering the purchase of items such as personal computers, special heavy duty equipment, etc., for the start up of individual businesses should obtain a county prosecutor opinion.

B. Transportation Assistance

Included in this category are a wide variety of approaches that facilitate transportation for needy assistance groups so that they have access to employment, training and child care. See Section III. **E.** for a discussion of federal guidance and state procurement issues regarding transportation. Transportation services may be provided under either

or both OWF and PRC. Transportation services funded by PRC funds are limited to OWF and PRC assistance groups. Before implementing a transportation program, ODHS advises counties to consult with their County Prosecutor's Office. The purchase of vehicles may create liabilities for the county that it should discuss with the county prosecutors office. Listed below are some of the types of services provided by counties:

Assistance to Obtain Automobile and/or Driver's License

- Repair; parts, service, towing charges, etc.
OWF and PRC - Fulton County
- Drivers education courses, driver's license fees, license plate fees
PRC - Scioto County
- Automobile insurance payments
PRC - Greene County
- Purchase costs including down payments, loan payments, purchase costs
PRC - Fulton, Shelby, Montgomery Counties
- Lease/rental costs including down payments, lease payments, purchase costs
PRC - Shelby, Fulton, Montgomery Counties
- Loans for down payment to purchase, lease or repair vehicle
PRC - Scioto County
- Automobile loan guarantee program to assist client to finance vehicle
PRC - Fulton County

Arrangement of Transportation Services

- Arrangements for car pools
PRC - Hamilton County
- Arrangements for van pools
PRC - Hamilton County
- Bus tickets, passes, tokens
OWF and PRC - multiple counties
- Taxi service, short-term for employment
PRC - multiple Counties
- Van shuttle service from targeted neighborhoods to specific employment sites not accessible by public transportation.
OWF and PRC - Hamilton County and others
- Transportation brokerage services
OWF and PRC - Hamilton County
- Subsidized bus routes, mini-bus services to and from targeted neighborhoods and employment sites.
OWF - Franklin, Montgomery Counties
PRC - Franklin
- Relocation expenses for employment
PRC Belmont County
OWF - Montgomery County

C. Prevention/Diversion Services

Services designed to prevent dependency of adults and/or minor children.

School Readiness Resource Center Services

Located in each of Ohio's twenty-one urban school districts, school readiness resource centers are designed to remove non-cognitive barriers to children's learning by creating critical linkages to health, social services, and other community resources. Another critical component of the resource centers is parent engagement in their children's education. A key underlying premise of the centers is that meeting children's non-academic needs via school-based or school-linked services will reduce truancy and drop-out rates which will subsequently reduce teen births, dependency on public assistance, and other non-desirable outcomes for students. Each district has at least three centers.

Such services include, but are not limited to, counseling, teen pregnancy prevention activities, before- and after-school programs, mentoring, home visits, incentives for improved academic performance, parent education and involvement activities, and information and referral activities.

-Services offered through the school readiness resource center are only available to students in assistance groups who are receiving OWF cash assistance.

OWF Only - Hamilton, Mahoning, Trumbull

-Services offered through the school readiness resource center are available to students in assistance groups who are receiving OWF cash assistance or whose assistance groups meet eligibility criteria for the county's PRC Program.

OWF and PRC - Lorain, Clark

Early Start

Early Start is a collaborative and integrated system of services and supports to help families create an environment conducive to the growth and development of young children, thereby enhancing a child's ability to learn and reducing incidences of child abuse and neglect. Supporting parents' efforts to achieve self-sufficiency is another key goal of the initiative. Early Start services are delivered through a community-based flexible service mechanism, including home visits. The target population includes assistance groups participating in the Ohio Works First (OWF) and/or the Prevention, Retention, and Contingency (PRC) programs who have children under age three. Thirty Ohio counties (with state general revenue funds) also target assistance groups with children under age three who have at least four risk factors, such as substandard housing, parent(s) with a substance abuse problem, acute family crisis, low birth weight baby, or parent under age twenty.

-Eligibility for Early Start is conditioned on the assistance group having a child under age three and receiving OWF cash assistance. Early Start services end when the assistance group becomes ineligible for OWF cash assistance.

OWF Only (42 counties) - Athens, Franklin, Henry, Lorain, Putnam, Richland, Stark, Wayne

-Eligibility for Early Start is conditioned on the assistance group having a child under age three and receiving OWF cash assistance. Early Start services continue under PRC until the child turns three.

OWF and PRC (27 counties) - Clark, Columbiana, Highland, Meigs, Miami, Warren, Defiance, Harrison, Williams, Gallia, Licking, Ottawa, Paulding

-Early Start service are available to PRC assistance groups who meet county determined criteria are supported by the targeted groups identified by the Early Start Program.

PRC (14 Counties) - Washington, Clermont, Muskingum, Noble, Sandusky, Shelby, Union, Harrison, Williams, Greene, Ottawa, Paulding, Vinton, Holmes, Huron

Other Preventive Services

- Parent education classes

PRC - Fulton, Cuyahoga Counties

- Diagnostic Services (i.e. services that are not covered under Medicaid.)

PRC - Fulton County

- School Outreach; prevention specialists for at-risk students

PRC - Washington County

- Youth advocates in schools

PRC Hamilton County

- Kids on Campus; academic enrichment and work skill training for youth

PRC - Athens County

- Service brokers with CDHS, CSB, ADAMHS, Juvenile Court, Public Schools, Metropolitan Housing Authority to assure seamless system

OWF and local funding Montgomery County

- Family nutrition education

PRC - multiple counties

- Family financial planning

OWF and PRC - multiple counties

- Child Development - ACT: a collaboration of agencies paid to provide services to avoid Dependency

PRC - Hamilton County

D. Contingency Services - Emergency Assistance/ Disaster Relief

One-Time-Only Assistance (Cash or Vouchers)

Contingency assistance are cash payments or vouchers for an emergent need as defined by the CDHS. (See definition of one-time-only cash assistance in Section II.

C.) An emergent need is a condition that threatens the health, safety, or decent living arrangements of an assistance group to the extent that it would prohibit the children from being cared for in their own home or inhibit job preparation, work and marriage. Examples of PRC one-time-only Assistance (not an all-inclusive list):

1. Utility assistance including payments to prevent gas, electric or water shut-off; purchase of bulk fuel for heating; installation or repair of telephone.
2. Shelter expenses including payment of rent or security deposit; payment to forestall eviction; payment of emergency shelter or temporary housing; payment of moving expenses; payment of mortgage; payment of interest on mortgage or taxes.
3. Personal expenses including purchase of necessary clothing such as school clothing, winter coats, work clothing; purchase of hygiene products such as soap, shampoo, deodorant, diapers, etc., purchase of child restraint seats.
4. Home Repair including purchase or repair of furnace or water tank; repair of items affecting basic home structure such as walls, roofing, plumbing, water supply, flooring, or water/sewage system.
5. Appliances including purchase or repair of stoves, refrigerators, heating stoves, air conditioners, fans, washer or dryer.
6. Furniture including purchase of bed, bed frame, mattress, box springs, kitchen table, chairs, etc.
7. Household expenses including purchase of bedding, linen, cooking and eating utensils, vacuum cleaner, brooms, cleaning products.
8. Disaster assistance (e.g. floods, tornados, blizzards) including cash payments to assistance groups. Counties may issue disaster assistance to individuals who meet the criteria the county specifies in its PRC plan. Additional assistance/funds for federally/state declared disaster sites will be addressed by ODHS when the situation occurs.

D. Child Welfare Services

General Recommendations

Counties that intend to fund Child Welfare Services through the OWF or PRC program should specify and coordinate these services through the Partnership Agreement and the plan of cooperation in the community plan. ORC Section 5153.165 gives guidance

on the partnership agreement. ORC Section 307.983 and OWF letter #4¹ provide further guidance on the OWF/Child Welfare Plan of Cooperation. Counties that want to provide services to child-only OWF assistance groups must use PRC to serve those families. Please refer to Section III. C. of this document for guidance on child-only OWF assistance groups. The following guidance is derived primarily from the Director's Letter of October 16, 1998, discussing TANF Funding Parameters.

Allowable Services

Child Welfare Services may be provided through OWF and/or PRC. These services may include, but are not limited to, case management, respite care, day treatment, diagnostic services, emergency caretakers, homemaker services, parent education, in-home services, special services for drug and alcohol abusers, transportation, unmarried parent services, domestic violence, post-finalization services, counseling, placement prevention, and family reunification for assistance groups eligible either under OWF or PRC.

The county must establish that the service is needed to avoid dependence of a needy assistance group either through the self-sufficiency contract under OWF or in the PRC plan. (See Section II **B. General Requirements for PRC eligibility** for defining a needy assistance group.)

Prohibited Services

A county may not use OWF or PRC funds to fund placement costs for residential, out of home, emergency shelter, or substitute care services.

Management Considerations

The management and funding of Child Welfare Services through PRC and OWF will vary depending on whether the county has combined or separated Public Children Services Agency (PCSA) and County Human Services (CDHS) Agency.

1. Combined Agencies - A county with a combined agency that chooses to provide child welfare services only to OWF assistance groups need not make any provisions in the county's PRC Plan. The county must include the child welfare services in the OWF Self-Sufficiency Plan. A county with a combined agency that chooses to provide child welfare services to needy assistance groups beyond those in receipt of OWF cash assistance must define the service and the needy assistance groups in its PRC Plan.
2. Separated Agencies - A county that chooses to provide child welfare services to only OWF assistance groups through a separated PCSA need not make any provisions in the county's PRC Plan. The county must include the child welfare services in the

¹ It should be noted that OWF Letter #4 will be reissued. Language on page 5 under "Interface: Minor Parent Living Arrangement", 2nd paragraph, Note: is incorrect and will be deleted.

OWF Self-Sufficiency Plan. An agreement or Memorandum of Understanding (MOU) between the CDHS and the PCSA defines the services and transfers TANF funds from the CDHS to the PCSA to pay for the child welfare services.

A county that chooses to provide child welfare services to needy assistance groups beyond those in receipt of OWF cash assistance through a separated PCSA must define the service and the needy assistance groups in its PRC Plan and enter into a Plan of Cooperation under Section 307.983 of the Revised Code. TANF funds to pay for the services are made available to the PCSA through an agreement or MOU with the CDHS. A county could choose to provide services under both PRC and OWF or to serve all needy assistance groups under PRC. An agreement or MOU between the CDHS and the PCSA defines the services and transfers TANF funds from the CDHS to the PCSA to pay for the child welfare services.

For further information on how to structure services and agreements between a CDHS and a PCSA, contact your Account Manager. For information on coding and billing, contact your Regional Fiscal Supervisor.

Examples of County Child Welfare Services

Examples of Child Welfare Services include but are not limited to the following:

- Family preservation and reunification services:
diagnostic services; therapeutic counseling; parent education and respite care.(i.e. services that are not covered under Medicaid.)
PRC - Huron County

- Emergency Assistance for child protective cases:
Housing expenses and rent deposits; utilities; furniture/ appliances; short term child care for children placed with relatives; food/ personal care; transportation to meet specific need; clothing; telephone services for special needs ; safety needs such as car seats.
PRC - Montgomery County
PRC - Franklin County

- Case management services for child protective cases
OWF and PRC - Montgomery County
PRC - Franklin County

- Family stability services including intensive case management
OWF and PRC - Clark County

E. Child Support Services

General Recommendations

Counties that intend to fund Child Support Services through the OWF or PRC program should specify and coordinate these services through the partnership agreement and a plan of cooperation in the community plan. ORC Section 5153.165 gives guidance on the partnership agreement.

Services Not Recommended

Based on the information provided in the Director's Letter of October 16, 1998, ODHS does not advise using TANF funds to provide the Child Support Services for paternity establishment, enforcement, and support order establishment. Such services are deemed primarily to be IV-D expenditures and would be subject to federal audit if charged to the TANF grant.

Services Recommended

ODHS does support the use of TANF funds for employment and training services for non-custodial parents. The U. S. Department of Health and Human Services has ruled that employment and training activities for non-custodial parents are not part of the IV-D mandate. ODHS recommends that the employment and training services be provided under the PRC program. If employment and training services are provided through OWF, it may require the inclusion of non-custodial parents in the federal reporting requirements. If a county intends to provide employment and training services to non-custodial parents, it should include non-custodial parents in its definition of an eligible PRC assistance group.

V. Reference

- A. The Social Security Act, Title IV, Section 408 - Requirements; Prohibitions
World Wide Web Reference - http://www.ssa.gov/OP_Home/ssact/title04/0408.htm
- B. U.S Department of Health and Human Services, Administration for Children and Families, Final Federal TANF Regulations
World Wide Web Reference - <http://10.1.7.11/Ols/federalregister/tanfreg.pdf>
- C. Ohio Statutory Requirements for PRC - HB 408
 - PRC statutory purposes - ORC Section 5108.06
 - PRC Program Definitions - ORC Sections 5108.01 and 5108.02
 - PRC Application and Eligibility Determination Requirements - ORC Section 5108.10
 - PRC Written Policies - ORC Section 5108.08
 - PRC services for PCSA - ORC Section 5153.165
 - County Plans of Cooperation - ORC Section 307.983

- World Wide Web Reference - <http://OhioActs.avv.com/122/hb408/home.htm>
- E. TANF Funding Parameters - ODHS Director's Letter of October 16, 1998
- F. U.S. Department of Health and Human Services, Office of Grants Management, Action Transmittal Letter No. OGAM AT 98-2
- G. The Office of Management and Budget Circular A-87 - Federal Cost Allocation Principles.
World Wide Web Reference - <http://www.whitehouse.gov/WH/EOP/OMB/html/circulars/a087/a087-all.html>
- H. Transportation Resources in TANF, Welfare to Work, and Jobs Access - TANF-ACF-PA-98-5
World Wide Web Reference - <http://www.acf.dhhs.gov/programs/ofa/pa-98-5.htm>
- I. Ohio Department of Human Services, Ohio Works First Letter # 1, August 28, 1997
World Wide Web Reference - <http://www.state.oh.us/odhs/owf>
- J. Loan Programs - Ohio Revised Code Section 321.23
- K. State/Local Alcohol and Other Drug Service Enhancement - ODHS/ODADAS County Commissioners Letter of July 28, 1998
- L. Ohio Department of Human Services, Ohio Works First Letter #4, February 27, 1998