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Governor



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OWF/PRC Guidance Letter No. 4

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

FROM: Jacqueline Romer-Sensky, Director 

SUBJECT: Meeting Family Needs through Multiple Assistance Groups

Attached is a guidance letter concerning the variety of ways counties can meet family needs through multiple assistance groups. Questions concerning the provisions of this document should be addressed to your regional account manager.

C: County Commissioners Association
OHSDA
PCSAO
Cheri Walter
Wayne Sholes
Deputy Directors
Technical Assistance Managers



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Meeting Family Needs through Multiple Assistance Groups

Assistance Group Umbrella

The Ohio Works First (OWF) Program is the primary program for providing cash assistance to needy families and requires participants to engage in work activities based on a self-sufficiency Contract when the assistance group includes an adult or a minor head-of-household. The Prevention, Retention, and Contingency (PRC) Program provides a broad variety of services and short-term benefits to needy families allowable under the federal Temporary Assistance for Needy Families (TANF) Program. In Ohio all families are served through defined Assistance Groups. Assistance Groups participating in the OWF Program are defined differently from those obtaining serves under the PRC Program. The OWF Assistance Group is established by administrative rule and, generally, is more restrictive than PRC in terms of who may be included in the Assistance Group. In order to serve a variety of family needs, the Federal Regulations provides states with the ability to create and serve multiple assistance groups from the same family. A county may have OWF Assistance Groups that overlap with PRC Assistance Groups.

Generally, a person can only be in one assistance group to receive OWF assistance payments. The exception to this is when a child is placed in the temporary custody of the county agency. In this instance, an OWF assistance payment that includes the child goes to both the birth parent and the custodial parent for a specified limited time. However, a child can be connected to more than one assistance group receiving PRC. Counties may create several PRC Assistance Groups to receive various services. Counties may construct PRC Assistance Groups so that allowed services as well as service and expenditure limits are applied differently to various PRC Assistance Groups. The logic for creating OWF Assistance Group is defined within the CRIS-E System. The key decision steps in determining how a county may want to construct a PRC Assistance Group is outlined in the last section below.

Examples of multiple Assistance Groups are outlined below. These examples include the overlapping PRC and OWF Assistance Groups. These examples are designed to convey various scenarios of multiple Assistance Groups but do not exhaust all the potential arrangements.

Figure 1

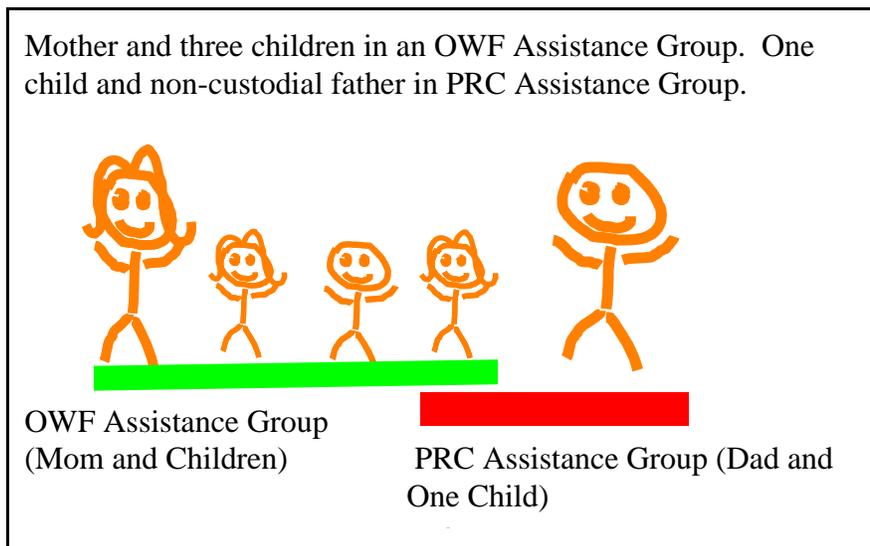


Figure 2

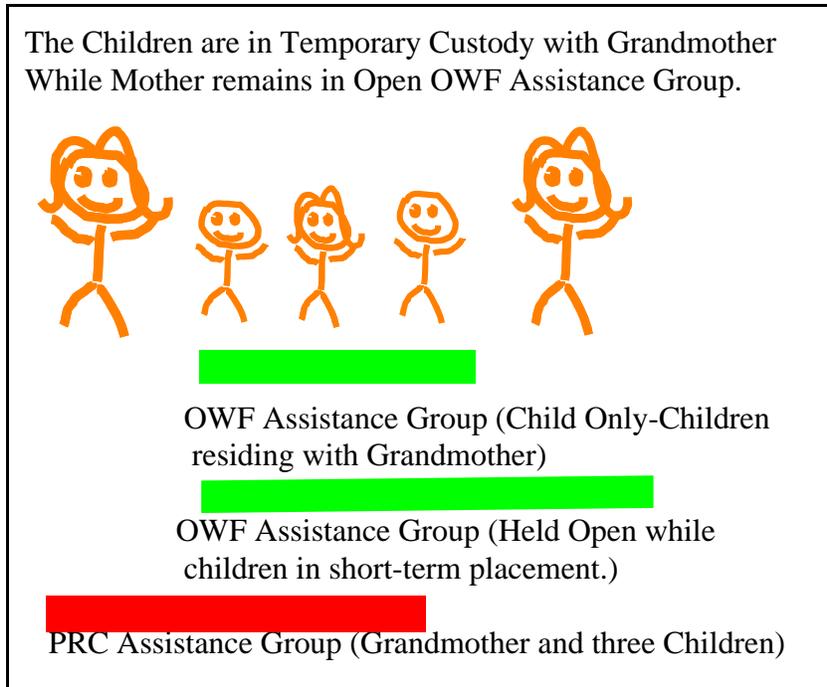


Figure 3

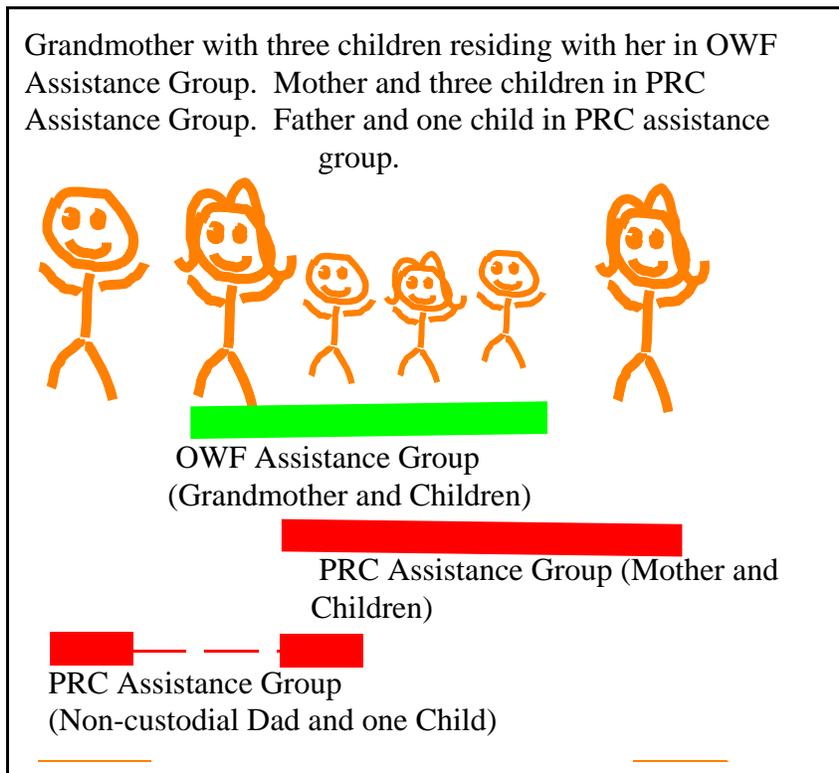


Figure 4

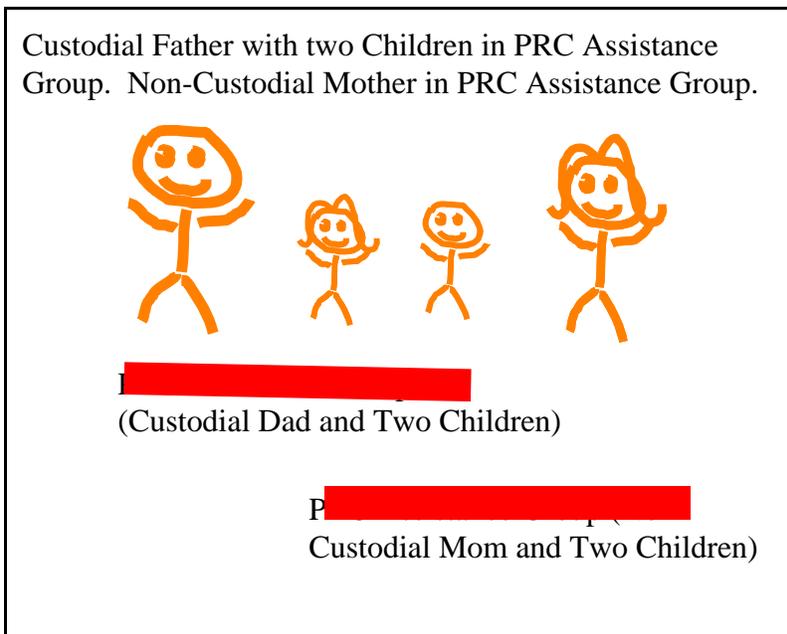
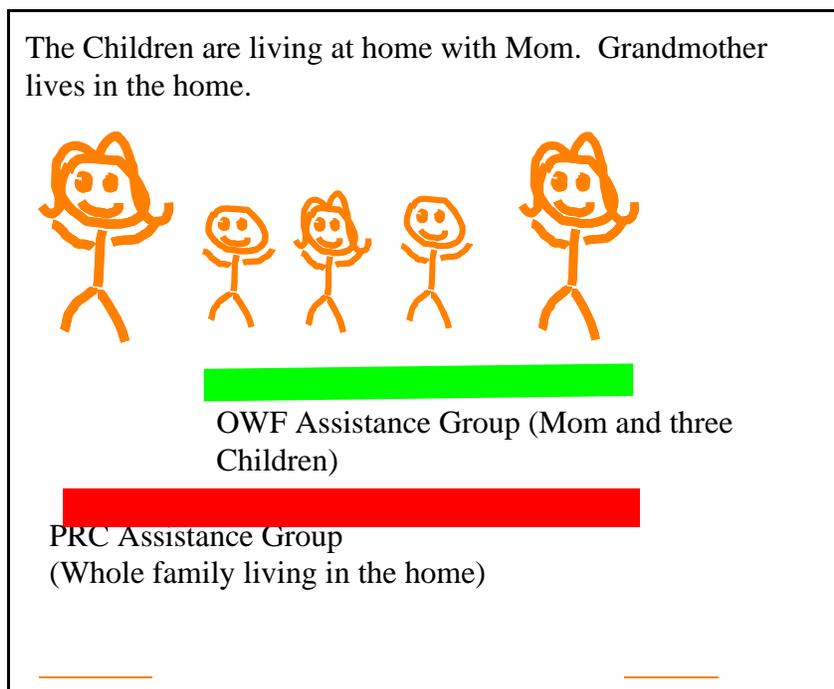


Figure 5



Different Service Strategies for Different Assistance Groups

The county may create one definition of assistance groups that applies to all services included in its county PRC Plan. 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. For example, a county may wish to identify the types of services and limitations for non-custodial parent PRC Assistance Groups that is different from those established for the Kinship Care PRC Assistance Groups. In addition, a county could identify a different set of services and limitations for employed PRC Assistance Groups.

Different Service Strategies for Same Assistance Group

A county may provide different services or benefits designed to meet various needs to the same assistance group. A county may create financial caps or service limitations for services or short term financial help to a defined assistance group. It may limit or cap some services/benefits and not others. The county may set a monthly, quarterly, or yearly limitations for services and financial caps. Receipt of service by one PRC Assistance Group does not preclude providing help to another PRC assistance group even if they both contain the same child. The dollar value provided to one assistance group does not have to count against the dollar value provided to another PRC assistance group containing the same child.

PRC Services to Non-custodial Parents

At Part 260.30 of the Federal Regulations a non-custodial parent is defined as

“a parent of a minor child receiving assistance who:

- (1) Lives in the State; and
- (2) does not live in the same household as the child.”

This definition of “non-custodial” parent in the final federal rules permits broad opportunities for counties to assist non-custodial parents. Counties may provide PRC financial assistance (non-recurring, short-term benefit only) and services to non-custodial parent assistance groups without affecting the benefits and services of other family members in another assistance group. Such services may include but are not limited to:

- Employment and Training
- Transportation (to employed individuals or as non-recurring, short-term benefit only)
- Automobile Expenses (to employed individuals or as non-recurring, short-term benefit only)
- Employment Related Expenses (to employed individuals or as non-recurring, short-term benefit only)
- Job Search
- Short Term Emergencies
- Parenting Classes
- Mediation Services
- Financial Management Services

Services such as Paternity, Location, and Collection Services and other direct IV-D services are to be funded through the Title IV-D Program. PRC services provided to the non-custodial parent are subject to PRC reporting requirements.

PRC Services to Support Family Preservation

The new federal regulations encourage provision of services designed to support children living in their own homes. Services may go to support parents and relative care givers to promote family stability, child and family reunification, and kinship care networks.

Counties wishing to provide services that support these goals may do so through a PRC Assistance Group or through OWF Assistance Group. When providing such services through an OWF Assistance Group, these services must be identified in the self-sufficiency contract. If the services are provided through a PRC Assistance Group, the Assistance Group and Services must be specified in the county's PRC Plan. Counties may construct PRC assistance groups to assist struggling families in keeping their children in their home or that will enable children to be returned to their home. Counties may construct Kinship Care PRC Assistance Groups to assist relatives of dependent children who are caring for these children. PRC may not be used to cover either short term or long term out of home placement costs.

Services to Employed Families

New federal regulations give increased flexibility to serving employed assistance groups. An PRC Assistance Group that is not on OWF is considered employed if the adult or minor caretaker is receiving compensation for services performed. Though unemployed PRC assistance groups may receive non-recurring short-term transportation or other benefits, they are not permitted ongoing transportation or expense allowances. Both transportation and work expense allowances are permitted an OWF assistance group whether or not employed. Counties may provide short term financial assistance through PRC to Assistance Groups having adults engaged in applicant job search as well as to Assistance Groups having a caretaker that is temporarily unemployed.

Medical Services

Generally, services provided by a medical practitioner may not be paid for with county PRC resources except for pre-pregnancy family planning services. PRC funds may be used for non-medical services such as outreach to ensure medical coverage. PRC funds may be used to pay for some appliances and services necessary to obtain and maintain employment such as physicals, drug screening, eyeglasses, and hearing aids. PRC funds may be used to conduct initial assessment of need for drug and alcohol services. Federal officials have ruled that PRC funds may not be used to purchase health insurance.

Decisions Steps to Create a PRC Plan

PRC Plans should be an extension of your community planning process. The PRC Plans are only as good as the Stake Holder ownership and Agency commitment. Outlined are steps to using PRC to implement critical community goals.

1. Decide on your goals for the PRC Program in your county.
2. Decide which types of assistance groups you need to target to reach those goals.
3. Decide which services you need to provide to those assistance groups to reach those goals.
4. Determine available resources for services.
5. Decide how you will manage providing services within the limit of your financial resources by capping

expenditures for certain assistance groups or services.

6. Examine results and unintended consequences.
7. Revise plans as warranted by experience.
8. Submit PRC Plans and subsequent amendments to ODHS.