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Governor



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November 2, 1999

OWF/PRC GUIDANCE LETTER NO. 8

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 

SUBJECT: Questions and Answers from the County Symposium on PRC

In September of this year, the department held a County Symposium on PRC. The purpose of the meeting was to discuss the release of additional funds for the PRC program (the Prevention, Retention and Contingency Development Reserve (PRCDR)). As a result of the symposium, counties submitted policy and fiscal questions on PRC. Attached are the responses to those questions.

Additionally, the following are reminders to counties regarding submission of PRCDR proposals:

1. Counties do not have to have all of their proposals developed covering all of their PRC Development Reserve funds before submitting proposals to ODHS. In other words, if a county has one or several proposals already developed, even though the proposal(s) do not obligate all of the county's Development Reserve, the county should proceed to submit the proposal(s) to ODHS.
2. Counties do not need to wait until the quarterly deadline to submit proposals to ODHS if the proposal is sufficiently developed for submission. In other words, if a county has a proposal sufficiently prepared as of the end of October, it should submit it at that point rather than waiting until the December 1 deadline.
3. Counties have expressed concern that local project implementation may not begin until that later part of the first quarter of funding and that consequently budgets for the first quarter are difficult to project at this point. Nevertheless, counties should submit proposals by the December 1 deadline even though budget information may not be fully developed. This will assure that a county's Development Reserve funds will not be inadvertently released. This is true of subsequent quarters as well.

c: County Commissioners Association
OHSDA
PCSAA
Cheri Walter

Wayne Sholes
Deputy Directors
Technical Assistance Managers
Bureau Chiefs in County Ops.

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RESPONSES TO PRC SYMPOSIUM QUESTIONS - PROGRAM ISSUES

This portion of the responses excludes certain questions relating to the provision of child welfare services. The responses to questions relating to these additional issues will be addressed under separate cover. We have also included a clarification to a previously answered question at the end of the regional questions and responses.

Many of the following questions ask whether PRC funds can be used for a particular service or benefit. There are some general principles to consider in determining whether the use of funds is appropriate. Counties decide, through their PRC plans, the services and benefits that are to be provided using TANF funds. As a general rule, counties must use the available funds for eligible, needy families¹, with a child² and the use of PRC funds must be to meet one of the four purposes of TANF:

- a. To provide assistance to needy families;
2. To end dependence of needy parents by promoting job preparation, work and marriage;
3. To prevent and reduce out-of-wedlock pregnancies; and
4. To encourage the formation and maintenance of two-parent families.

Question 1. Can an agency use PRC funds to purchase food? (Region 7)

Response 1. PRC funds can be used to purchase food for eligible families if it is a covered benefit under the county's PRC plan. It is important to understand that since food meets a "basic need", any benefits for this purpose would have to meet the criteria for nonrecurrent, short-term benefits [reference 45 CFR 260.31(b)(1)].

Question 2. Can an agency determine categorical eligibility such as a school for PRC funds? If so, how would the agency handle state hearing requirements such as notice?

Response 2. If you are asking whether you can provide services to all children in a particular

¹ Purposes 3 & 4 are not limited to "needy" families. For federal reporting purposes, costs relating to these purposes must be tracked and identified. Refer to the "CORe General Table and Mapping Reports" which was sent to all County Human Service Directors on 10/22/99.

² PRC funds may only be used to provide benefits and services for children who reside with a parent, specified relative, legal guardian, or legal custodian (or to a pregnant woman). A child may be "temporarily absent" from the home for up to six months in accordance with the time periods in ORC 5107.10 (which are applicable to PRC) and still qualify for PRC. During the temporary period, the child is considered to be residing with the parent, specified relative, legal guardian, or legal custodian. The county may continue to help the eligible family through expenditures that are reasonably calculated to accomplish one of the four purposes of the TANF program including some expenditures for the temporarily absent child. The child must return to the home by the end of the six-month period. Otherwise, the child no longer resides with the parent, specified relative, legal guardian or legal custodian. HHS does not believe it is reasonable to determine that a child is temporarily absent from the home if the child has been adjudicated or otherwise determined to require placement out of the home for longer than the state's established temporary period (i.e., six months).

school without regard to need, the answer is yes, in certain circumstances. The use of federal TANF funds to accomplish either purpose 3 or 4 is not limited to “needy” families. Counties may use PRC funds to serve non-needy families for either of these two purposes. It should be noted that although federal TANF funds can be used in this manner, there are restrictions in using MOE funds for these purposes. MOE funds must always be expended on “eligible families” i.e., one that is *financially* eligible. For these reasons, costs relating to these purposes must be tracked and identified. Refer to the “CORE General Table and Mapping Reports” which was sent to all County Human Service Directors on 10/22/99.

There are a variety of ways that a county could ensure that a family receives their hearing rights and notice of benefit approval or denial. How this is accomplished is dependent on the application process established by the county.

Question 3. Can PRC funds be used to pay a stipend for mentor volunteers? (Region 7)

Response 3. Direct delivery services performed by contractors or agency staff may be paid from regular PRC or reserve funds if part of approved PRCDR application. If the service is provided by agency staff, they must participate in the Random Moment Sample.

Question 4. If Children’s Services is placing a child in a custodian’s care and PRC services are needed, does the agency count the custodian’s income or can the agency ask the CSB to provide a safety or case plan and waive the income guideline? (Region 7)

Response 4. In determining financial eligibility, the worker would count the income of all assistance group members, i.e, the child for whom services are provided and members of his or her assistance group as defined by the CDHS. The county has the flexibility in their PRC plan to include or exclude the custodian from the assistance group containing the child.

Question 5. Children’s Services wants to place a social worker in the schools. Can PRC funds be used to pay salary and other expenses such as supplies and mileage? (Region 7)

Response 5. Counties must include this as part of the cost pool and report this information on the random moment sample under activities for TANF. No direct charge is allowed.

Question 6. Is the county PRC plan the same as the PRCDR? Are two plans needed? (Region 7)

Response 6. The PRCDR funding application is separate from the county's PRC plan. The county must complete the PRCDR funding application in order to access increased funding for their PRC program. Once a county is notified of funding approval, their PRC Plan will need to be amended to appropriately reflect the service expansion that will be covered in the county's PRC program. As indicated in the material handed out at the recent County PRC Symposiums, upon receipt of the CDHS amendment to the PRC Plan and a simple amendment to the Partnership Agreement, the Office of Fiscal Services will issue a county allocation letter indicating the PRC Development Reserve funding allocation.

Question 7. Define expanded services. (Region 7)

Response 7. Expanded services are those services targeted to the eight designated priorities that are not currently covered under the county's existing PRC Plan. It also includes existing covered services that are being expanded to a larger population.

Question 8. If a county opts not to use PRCDR funds will there be ramifications? (Region 7)

Response 8. Yes, if a county opts not to use their PRCDR funds, their portion of the funds will be reallocated.

Question 9. Can PRC funds be used to pay salaries for job coaches? (Region 7)

Response 9. Reference the response to question #3 regarding salary cost.

Question 10. Can PRC funds be used to pay for college tuition? (Region 7)

Response 10. A county may, unless otherwise prohibited by the law, spend PRC funds in any manner reasonably calculated to accomplish the purpose of the law. One purpose of the law is to provide assistance to needy families; another purpose is to end the dependence of needy parents on government benefits by promoting job preparation, work and marriage. College tuition-related costs could be viewed as reasonably calculated to accomplish a purpose of TANF for members of needy families.

Question 11. Can PRC funds be used for respite care? How is respite care defined? (Region 7)

Response 11. The provision of respite care is dependent on whether the use of such funds will meet a purpose of the TANF program. A definition of respite care used in child welfare rules is: "services designed to provide temporary relief of child-rearing functions which includes services such as crisis nurseries, day treatment, protective

day care, and volunteers or paid individuals who provide such services within the home”.

Question 12. Can PRC funds be used to cover homemaker services? (Region 7)

Response 12. The provision of homemaker services is dependent on whether the use of such funds will meet a purpose of the TANF program.

Question 13. Can PRC funds be used for salaries, stipends, or program costs for therapeutic foster care? (Region 7)

Response 13. No, this would be considered a foster care cost and is not reimbursable By TANF funds.

Question 14. If unit of service is defined as a program, can the service be provided to free-riders? (Regions 8 & 9)

Response 14. Other individuals may participate in a service funded by PRC so long as PRC dollars are not used to subsidize or pay for persons who are not members of eligible families.

Question 15. Can funds be used to extend Medicaid services beyond what Medicaid would pay? (ex: Medicaid pays for 3 days of detox services but county wants to extend to 5 days.) (Region 6)

Response 15. No, this would be considered to be a medical service and due to the prohibition, is not allowable.

Question 16. Can funds be used to pay for what would be a covered Medicaid service for an individual who is not Medicaid eligible? (Region 6)

Response 16. If the “Medicaid-covered” service is not “medical” in nature (such as counseling), funds may be used if the provision of the service would meet one of the purposes of TANF.

Question 17. Early Start programs do not issue approval or denial notices for services - of which PRC could be funding - why should CDHS' be required? Can this be simplified? (Region 6)

Response 17. State hearing rules require that approval and denial notices be sent each time an application for PRC is made. Local agencies may modify the format, but not the content, of state hearing notices mandated in Chapters 5101:6-1 to 5101:6-9 of the administrative code. Such modifications must be prior approved by the Office of Legal Services.

Question 18. Will the state be coming up with a simple to use database (in Paradox or Q-Pro) for recording PRC information such as demographics and services since CRIS-E would most likely not be able to accommodate such info? Also, when will the state be supplying the counties with the information that is needed for recording of PRC that the feds require? (Region 6)

Response 18. Reporting requirements will be addressed under separate cover.

Question 19. If a social worker is in the schools, what is the recommended process for application since parents are not at the school? Can income be disregarded in these cases? (Region 6)

Response 19. Counties have great flexibility regarding the PRC application process. The county could work with the school to determine if there is an existing document that could serve as an application in this instance. Another possibility would be to send the application to the child's home along with a return envelope.

If you are asking whether the county needs to establish an economic need standard, the answer is dependent on which purpose of TANF the provision of service is meeting (see footnote 1).

Question 20. Can PRC be used to hire a counselor for MRDD to see non-Medicaid individuals only? (Region 6)

Response 20. Based on the information in this question, it doesn't seem to be a course of action to pursue. For further discussion, contact your Account Manager.

Question 21. Can the CDHS use PRC development reserve money for both PRC and OWF self sufficiency contract services? (During the meeting Stan said "yes," please include the answer in the written responses. Also, expand the answer if needed.) (Regions 2 & 3)

Response 21. Yes, the PRCDR dollars can be used for benefits and services to accomplish any of the eight priorities outlined in the overview of the "PRC Development Reserve" document that was distributed at the County PRC Symposiums.

Question 22. Why is child care excluded? There are a couple of issues: A) Increasing or supplementing rates may improve provider recruitment (one person mentioned that we cannot raise rates due to a requirement to pay a uniform rate that is the same as the private market rate), B) Could use more money for recruitment activities and unique programming, C) Child Care funds have been short in the past and the counties had to freeze services, TANF could alleviate this situation. (Regions 2 & 3)

Response 22. Child care is excluded because Ohio has a statewide child care program with income and eligibility requirements established in state law and in rule. State law currently prohibits publicly funded child care services to be provided for anyone over 185% of poverty. The child care subsidy program has been a fully open program for over a year now and since funding is very secure we do not anticipate any closing or reduction in the level of services. In fact, the General Assembly in the budget bill included a provision allowing the state to raise eligibility to 200% of poverty after July, 2000.

A) The rate paid to a provider is the lower of either the state maximum rate or the customary charge that the provider charges privately paying customers. There are some instances where a provider can be paid above the market rate, i.e.: accredited centers, non-traditional hour care. If the rates are not competitive in the market area that a county is serving, a county can request a waiver to pay above the market rate due to a unique market condition.

B) Some counties have chosen to use their child care quality allocation to "improve" the retention of their provider base and to do additional recruitment activities.

C) See opening paragraph. ODHS reserves the right to hold the TANF funds dedicated to child care services at the state level to maximize every opportunity to expand services. Any transfer of TANF to the CCDF will take place at the state level, as needed depending on the utilization and incomes/situations of families on the child care program. With the CCDF, TANF transferability and TANF funds used directly for child care of OWF families, there are adequate funds available to serve families and not "freeze" the program.

Question 23. Client application model is cumbersome - if the counties knew the required data items they could better design their own application form. The list of data elements is due out on 10/15, there was scepticism among some of the group that they would not see the list until November. (Regions 2 & 3)

Response 23. In accordance with ORC 5108.10, the CDHS is free to design their own application. We felt that the information requested on the state's model recorded the applicant's circumstances and gathered minimal information needed to determine the family's needs.

The list of data elements will be used to report program expenditures and is not the type of information that can be collected on the PRC application. The list was mailed to County Human Services Directors on 10/22/99.

Question 24. On page 4 of the Draft letter, in the section regarding services to

non-custodial parents and the bottom of page 7 are statements about residency requirements of the child. Does the child have to be a resident of the state? Does the child have to be a resident of the county? (Regions 2 & 3)

Response 24. Page 4 of the draft letter reflects the federal definition of a noncustodial parent. In accordance with 45 CFR 260.30 a noncustodial parent is a parent of a minor child who: (1) lives in the **state**; and (2) does not live in the same household as the minor child.

The statement at the bottom of page 7 reflects the requirement for the state model. In other words, in the state model we chose to only serve noncustodial parents in our “fictional county” as opposed to serving all noncustodial parents in the state.

Question 25. Must the child receive assistance? Page 4 1st paragraph. Jeanne answered “no” during the session. However the Federal Register Final TANF Regs page 17878 section 260.30 does say the child must be receiving assistance. (Regions 2 & 3)

Response 25. No, the child does not have to be in receipt of assistance in order to assist the noncustodial parent. Because of this confusion, HHS has revised the definition of “noncustodial parent” in 45 CFR 260.30. The definition now reads, “noncustodial parent means a parent of a minor child who: (1) lives in the state; and (2) does not live in the same household as the minor child”. The guidance letter will be changed to reflect this new definition.

Question 26. Restrictions on medical services are not clear, there are variations in the different guidance letters. The multiple letters are confusing. The group advocated for a single PRC document with numbered tracked revisions. (Regions 2 & 3)

Response 26. We understand county confusion regarding the medical services issue. The responses provided to you are based on the federal prohibition on the use of medical services (with the exception of prepregnancy family planning services). As you may be aware, HHS has not defined medical services. At this time we feel that certain services may be covered as long as the service is reasonably related to removing barriers to employment (such as an employment-related physical), rather than targeted to more general coverage. As more information becomes available from HHS, we will continue to advise you.

Question 27. The group discussed the CRIS-E entry requirements. Currently we have not required the CDHS to enter Early Start and School Readiness into CRIS-E. Why not keep all of PRC out of CRIS-E? It is not/may not be able to gather

adequate information currently. The other side of the issue is that CRIS-E does generate approval/denial letters that the worker would otherwise need to do manually. If the PRC is in CRIS-E, we maintain the ability to track receipt when a person moves from county to county. Why include cumbersome administrative requirements like an application and CRIS-E entry? (Regions 2 & 3)

Response 27. Reporting requirements will be addressed under separate cover.

Question 28. Who is responsible for the application process if we are contracting for a service? We answered that it could be either CDHS or the provider who takes the application, and this needs to be addressed in the contract. Also, you can use different applications for different services and the client does have hearing rights. (Regions 2 & 3)

Response 28. Your answer is correct.

Question 29. Does the county need to have individually identified clients in programs such as school programs or unwed pregnancy prevention programs? We answered no that type of expenditure would be administrative and would not require individual applications. (Regions 2 & 3)

Response 29. State law requires an application for all PRC services/benefits. The only exception to this would be when there is no direct service to an individual, such as a media campaign for pregnancy prevention.

Question 30. Two general observations from the group that are noteworthy and may be appropriate to respond to: 1) PRC may become a new “dependency” program especially if no one tracks it across counties and if we hold no one accountable for sufficiency activities and progress toward self sufficiency. 2) Many tight time lines all fast approaching. Counties are concerned about getting proposals in for the first quarter as there are political and public relations dangers to missing the first quarter deadline. For instance “OHIO CDHS PASSES ON \$200,000 DUE TO LACK OF PLAN.” (Regions 2 & 3)

Response 30. Regarding your second point, please refer to cover letter of this document.

Question 31. Is it permissible for a county to provide PRC money in the form of a subsidy payable directly to a Child Care Center? If so, what is the impact on the Food Stamp program, if any? (Region 4)

Response 31. If a provider is offering some additional TANF eligible services to PRC eligible families in your county at a child care center, it would be permissible to pay the center for those services to those eligible families, i.e.: a family literacy component

at the center, parenting programs, etc. These type of services would have not impact on food stamp eligibility.

Question 32. Please clarify “medical services” in light of what appears to be conflicting information contained within OWF/PRC Guidance Letters 1 and 4. (For example, eyeglasses are a Medicaid covered service, but OWF/PRC Guidance Letter #4 states these are permissible expenditure under PRC.) (Region 4)

Response 32. See the response to question #26.

Question 33. What are ODHS and federal auditors going to be looking for? Are ODHS and the federal auditors talking about this? (Region 4)

Response 33. See fiscal response to Region 4, question #3.

Question 34. Is it permissible for a county to provide guaranteed loans (such as for purchasing a car) under PRC? (Region 4)

Response 34. Yes, see OWF/PRC Guidance Letter #1.

Question 35. For some services, such as transportation and after-school programs, must there be an application? Must these be entered into CRIS-E? (Region 4)

Response 35. Reference the response to question #29.

Question 36. When delivering child welfare case management services, is an application required? (Region 4)

Response 36. Reference the response to question #29.

Question 37. What is the dollar amount that the county is supposed to enter into CRIS-E for PRC ongoing services? If everything has to be entered into CRIS-E, how do counties determine what is a benefit and what is a service? (Note, this question is also being asked of Lou Ann.) (Region 4)

Response 37. Reporting requirements will be addressed under separate cover.

Question 38. Many questions arose regarding inputting information into CRIS-E. Counties would like guidance on exactly what does and does not have to be input into CRIS-E. (Region 4)

Response 38. Reporting requirements will be addressed under separate cover.

Question 39. Does state acceptance and approval of a PRC proposal abrogate county liability in any audit finding? (Region 5)

Response 39. ODHS does not approve PRC proposals or PRC plans. ODHS only authorizes funds. The responsibility for audits remains the same.

Question 40. If a county uses PRC funds to subsidize income, is there a cap on the amount which can be used for this purpose, and is there a time limit? (Region 5)

Response 40. The answer to this question is dependent on what the PRC payment is meant to cover. If the payment to the family is meant to supplement their *ongoing* basic needs, it would fall within the federal definition of “assistance” and issuance of PRC would not be appropriate.

If, on the other hand, this situation is temporary (for instance, the family is expecting a new income source) and the family is in need of short-term help, issuance of PRC could be made for up to a four-month period (i.e., it would have to meet the definition of nonrecurrent short-term benefits). The amount of this payment would be up to the county.

Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training) are specifically excluded from the federal definition of assistance and are, therefore, allowable under PRC. Again, the amount of the work subsidy would be up to the county.

Another category excluded from the federal definition of assistance is “support services such as child care and transportation provided to families who are employed”. This exclusion could include a reasonable work expense allowance payable to the family (i.e., an ongoing “subsidy”). The purpose of the payment is what is important in distinguishing whether it is assistance or nonassistance. There is an important difference between a payment intended to meet or supplement ongoing basic needs (which *is* assistance) and a payment to offset work expenses (which *is not* assistance).

Question 41. Can a county use PRC to subsidize child support? If so, is there a cap on the amount which can be used for this purpose, and is there a time limit? (Region 5)

Response 41. We assume your question concerns subsidizing child support payments that are received erratically or that are inadequate to meet the family’s basic needs. Generally, the answer to this question is no, because such a payment would meet the federal definition of assistance. PRC could, however, be issued for this purpose if such payment met the definition of a nonrecurrent short-term benefit.

Question 42. Can we place approved PRC proposals on the InnerWeb so that they can be shared with other counties ? (Region 5)

Response 42. The Office of County Operation is in the process of developing an Innerweb page and the feasibility of posting the proposals on this page will be considered. Currently we do not receive the proposals in an electronic format.

Clarification of previous interpretation:

We have received questions in the past regarding whether PRC payments for car insurance reimbursements could be made on an ongoing basis or whether they would have to meet the definition of nonrecurrent short-term benefits (i.e., could these type of payments only cover up to a four- month period?). Based on the discussion of the definition of assistance in the preamble to the final TANF regulations, it was our understanding that these payments would have to meet the definition of nonrecurrent short-term benefits, and as such, would be limited to the four-month period.

Upon further review of the federal fiscal reporting requirements and further discussion with the Chicago Regional Office, we have determined that car insurance payments to **employed** individuals would be excluded from the definition of assistance as a supportive service to families who are employed rather than as a nonrecurrent short-term benefit. As such, these benefits can be issued without regard to the four-month limitation.

RESPONSES TO PRC SYMPOSIUM - FISCAL

REGIONS 2 AND 3:

- 5. Is there any way to get dollars before spending? Joe answered yes, we include the PRC reserve in the cash flow process. Supplement advances are also possible. Call your fiscal supervisor for assistance.**

This answer is correct.

- 6. Does the county need to submit a proposal for the same project that may last for more than one quarter or even fiscal year every quarter or fiscal year? We collectively answered no. The county should define the program time line and longevity in the initial application. One application can cross fiscal years and run for the entire 18 month period.**

This answer is correct.

- 7. Must expenditures per quarter be within that quarter's allocation? Joe answered no, if you do not to exceed the total allocation for the entire period.**

This answer is correct.

- 8. Encumbered funds include incentives. Originally, we told the counties that they could carry over incentives from one fiscal year to the next. How is the new requirement congruent? Joe answered that you just need to show planning to spend 90% of all funds.**

This answer is correct.

- 9. What happens at the end of the block grant 2002, if there is no continued funding for the successful programs we develop now? Joe answered that predicting what funding will be in the future is not possible, but it is probable that if we do not show use of the money to affect poverty the feds will not continue funding at the current level.**

This answer is correct.

Questions from PRC Symposium Day 2, Region 2 & 3:

- 1. Can the county reserve money for potential disasters and have this count toward the 90% planned expenditures?**

Counties should use the 10% left after they have obligated the 90% planned expenditures for unanticipated expenditures such as a natural disaster. Additionally, ODHS has a \$5 million annual TANF reserve for disasters that is outside of any allocations.

- 2. Can they count a “rainy day” set aside towards the 90% planned expenditures?**

Counties have 10% cushion for unplanned expenses. Counties can plan for ceiling excesses and/or other potential obligations that count towards the 90% planned expenditure.

- 3. Will the county get a new allocation letter when we enter a new fiscal year?**

Yes, for the balance of a project or for a new project.

- 4. How can you do a cost budget for an RFP before we approve the plan?**

The county should have an idea of how much they want to pay vendors for a specific service. The ITB can be a help in this process. Account Managers and Fiscal Supervisors can work with counties on determining a budget.

5. What can we expect in an audit and what type of documentation should we have?

The county should have sufficient documentation to satisfy federal and state law requirements for PRC. This may include: an application that shows how the assistance group served is eligible for PRC, data elements, participant data, how service(s) relates to PRC plan, compliance with ODHS cost allocation (time study documentation), voucher documentation, need determination, compliance with state and federal regulations and OMB Circular A-87.

REGION 4:

3. What are ODHS and federal auditors going to be looking for? Are ODHS and the federal auditors talking about this?

See Number 5 above. ODHS audit staff are talking about how to audit PRC as well as the Auditor of State. No definitive feedback has been received from the AOS. ODHS audit staff may do management citations for the first year and take financial findings at a later date.

4. Is it permissible for a county to provide guaranteed loans (such as purchasing a car) under PRC?

Yes, See PRC Guidance Letter No. 1.

7. What is the dollar amount that the county is suppose to enter into CRIS-E for PRC ongoing services? If everything has to be entered into CRIS-E, how do counties determine what is a benefit and what is a service?

This question will be responded to under separate cover.

1. Counties would like a clearer direction of the 15% administrative cost cap in relation to PRC. What is the definition of administrative costs effective 10/1/99? Does it include direct services, and if so, what RMS and 2827 codes apply?

The 15% CAP applies on a statewide basis. Administration, effective October 1, 1999, is defined as shared costs and eligibility costs. Mappings identifying these costs will be issued.

2. When do shared cost changes for administrative expenditures become effective?

Since the inception of TANF, ODHS has reported “shared costs” as administrative cost. Effective October 1, 1999, we will include costs related to eligibility determination under the definition of TANF administration.

3. What is happening effective 10/1/99 with shared administrative costs?

See the response to Number 2 above.

4. Can caseload reduction incentive dollars cover the entire amount of shared costs? If so, how will QuIC deal with this?

No, it cannot cover the entire shared costs for the agency. It can be used to cover the shared costs related to the TANF program. This will be an adjustment in the system.

7. Do funds carry from quarter to quarter? If so, what does a CDHS do to make this happen?

Projects must be submitted prior to a quarter. If a CDHS does not submit a project request, those funds will be made available to other counties.

8. At the end of the fiscal year, is this a “drop dead” program? Counties need to know this for when they are negotiating their contracts.

The PRCDR funding is available through June 30, 2001. Due to Ohio Constitution and state law, ODHS cannot commit to funding for these projects beyond that date.

9. What is the difference between a grant and a contract? Which is better for a county to use?

A grant is a specific amount of money issued to a public agency that will be reimbursed for services and is based on actual costs incurred. A contract is based on unit of service, actual cost, and must follow procurement process.

Counties must follow APM guidelines. Whether a county uses a contract or grant is contingent upon whom the county is procuring services from. Most instances, a contract is required.

10. If a county’s PRCDR proposal is approved by ODHS, but the county does not have “The official” signatures on their contracts (such as in situations where some provider boards only meet once a month, etc.), is it permissible for the CDHS to go ahead and start the project or must they wait until they have the official sign-off of their providers?

To avoid potential audit findings, it is recommended that the appropriate signatures be obtained prior to commencing with any services.

- 11. If a county is purchasing Social Services, must an agency follow prescribed bidding processes OR may they bypass the bidding processes, such as with Title XX?**

It is recommended that the county following procurement procedures in the APM.

- 13. Same situation as in #12, but the county has another proposal they would like to submit. Can the money from the terminated project be used for the new project?**

Yes.

- 14. Are the old PRC codes going to be eliminated?**

These codes are being time limited.

- 15. Are PRCDR monies going to be coded the same?**

Please refer to the coding that was sent out.

- 16. Is it possible to “co-mingle” eligible PRC and non-eligible PRC populations for the same services? If so, how does the CDHS set up the budget?**

Yes, but the county needs to have a methodology to determine actual costs related to PRC.

- 17. Can contractors require various costs, such as unemployment compensation insurance, be included in their contract?**

This is contingent upon the type of contract and should be addressed by your county prosecutor.

- 18. In regards to TANF E & T money, does this money become part of the consolidated allocation? Several county directors were concerned that if this money goes into their consolidated allocation, they will not be able to demonstrate that 90% of their monies are obligated. Does this allocation go away 06/30/00 and, if so, are there any plans to replace these dollars?**

TANF E & T is not part of the consolidated allocation.

REGION 10:

- 1. If a county has approved plans accounting for all of their PRCDR money, and they come across a great new idea that they feel would be better than some of their earlier**

plans, can they ask for the new project to be approved and move the money from a previous project to the new project?

Yes.

- 5. If a county doesn't use its first quarter money but comes up with a good project after 12/1/99 that they want to begin the first quarter (01/00-03/00), do they have to wait until 03/00 to start the project? If no, can they use the first quarter funds?**

Counties wishing to utilize first quarter funding must submit a plan prior to 12/1/99 or lose the first quarter's funding.

- 7. If a county can't get their proposal together to access their money by 12/01/99, can they request for all/or some of the money to be held until the second quarter as they would be able to access it then?**

See #5 above.

- 8. If released money is out after the first quarter, how will counties be advised of it, and in what order will they be able to access it for their proposals? Is it first come first serve?**

Released funds will be distributed on a pro-rated basis and made available to counties with projects submitted.

REGION 7:

- 1. Why are incentives included as funds that needed to be obligated before applying for all the PRCDR funds?**

ODHS wants to assure that all TANF funds are spent and incentives are not held until the very end of the block grant or not spent at all.

- 2. Will there be something released that says 90% of funds need to be obligated versus 100%**

There will be APM policy.

- 3. If the agency has obligated its funds, but they delay submitting their project for six months, do they need to have another fiscal review?**

The budget is only required when a county has a project. Fiscal will be monitored on an on-going basis.

4. When will the definitions of the new PRC codes be released?

Definitions will be issued with the new mappings.

REGIONS 8 & 9:

1. Partnership Agreements have incentives for lowering administrative costs. Will this apply to the PRCDR as well?

No. The administrative costs savings relate to consolidated funding.

2. Must PRC contracts go through competitive bidding?

Counties should follow the APM, state and federal law, and prosecutor opinion.