

LUCAS COUNTY COMMUNITY PLAN

PLAN OF COOPERATION

CHAPTER 200

PREAMBLE

The Board has, in accordance with Section 307.983 of the Ohio Revised Code, entered into a written Plan of Cooperation with the **Lucas County Department of Human Services (“LCDHS”)**, the **Lucas County Children Services Board (“LCCSB”)**, the **Lucas County Child Support Enforcement Agency (“LCCSEA”)** and has adopted this plan by resolution. This Plan has been developed to enhance the administration of the Ohio Works First program, the Prevention, Retention and Contingency Program and any other programs or social service duty the Board has included in this Plan.

The purpose of this agreement is to work together as partners to create a collaborative environment to deliver and administer services to Ohio Works First (“OWF”) participants. These services are designed to assist OWF participants to become self-sufficient. Our focus is to shift from eligibility determination for providing benefits to assessing and building skills to assist people to secure employment.

In order to effectively accomplish this transition, we are continually establishing partnering relationships with community organizations to make services more efficient and goal-oriented for participants. In doing so, our goal is to avoid duplication of services and to reduce gaps in services. This is a change from the past where agencies have been individualistic in their approach to providing social services. This resulted in confusion and additional steps for the people whom we serve. With our new collaborative approach, we will outreach to build more user-friendly and streamlined services. The goal of this approach is to have a substantial impact on the OWF participants’ ability to gain and retain employment in our community. Key stakeholders in this approach also include:

- ▶ The Lucas County Mental Health Board (“LCMHB”)
- ▶ The Ohio Bureau of Employment Services (“OBES”)
- ▶ The Private Industry Council (“PIC”)
- ▶ The Toledo Public Schools and The Lucas County Schools
- ▶ The University of Toledo
- ▶ Local Vocational and Trade Schools
- ▶ The United Way of Greater Toledo
- ▶ The Lucas County Family and Children’s First Council
- ▶ The Toledo Area Chamber of Commerce
- ▶ The Economic Opportunity Planning Association of Greater Toledo (“EOPA”)
- ▶ Other County and Community Agencies

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An example of our “spirit of cooperation” is shown through a “Memorandum of Understanding” between the Lucas County Department of Human Services and Lucas County Children Services. It was entered into for the purpose of accessing TANF funding through the Department of Human Services TANF allocation to reimburse LCCS for allowable TANF expenditures. **(SEE CHAPTER 200 - APPENDIX 2A)**

Employment goals are focused upon Prevention, Retention, and Contingency (“PRC”) services. This approach will place an emphasis upon services, which will *prevent* reliance upon cash assistance and guide participants to self-sufficiency. Services are also designed to help participants to *retain* employment, and thereby maintain self-sufficiency. Also, services are provided which assist a participant to meet a presenting or *contingent* need which, if unsatisfied, threatens the participant’s safety, health, or well-being. Specific strategies to achieve these goals are further defined in this Partnership Agreement. Stakeholders to this Agreement are committed to a long-term process of collaboration to develop and maintain an effective, integrated, and holistic approach, which will benefit the community.

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ASSESSMENT/APPRAISAL

PURPOSE

To establish the procedures for linking families participating in the OWF program to needed services, including services to victims of domestic violence, substance abuse treatment and Children's Protective Services when identified through the OWF assessment/appraisal. **(SEE CHAPTER 200 - APPENDIX 2B)**

1. During the assessment/appraisal, if the LCDHS worker becomes aware that domestic violence is occurring or has occurred, the LCDHS worker will inquire a) whether children are the victims of the violence or have witnessed the violence; b) if the batterer continues to have access to the assistance group; c) what intervention has occurred; and d) what additional intervention the family needs.
2. Based on the assessment/appraisal, if domestic violence is or has occurred and there is a need for services, the LCDHS worker will provide the family with information regarding available community resources to victims of domestic violence.
3. If the LCDHS worker has knowledge that a member of the assistance group has been a victim of domestic violence and the batterer is present during the assessment/appraisal, inquiry about domestic violence could put the victim at risk and should be avoided.
4. If domestic violence was indicated to have occurred or is occurring, the LCDHS worker will complete the required form to be submitted to the ODHS for statistical analysis.
5. Based on the assessment/appraisal, if substance abuse by a member of the assistance group is indicated, the LCDHS worker will provide the family with information regarding available community resources for substance abuse assessment and treatment.
6. Based on the assessment/appraisal, if child abuse or neglect is indicated, the LCDHS worker will immediately call the LCCS Intake.

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CONFIDENTIALITY AND INFORMATION SHARING

I. SITUATIONS WHICH DO NOT REQUIRE A RELEASE

(Applies to OWF Participants, CDHS and PCSA)

As an Ohio Works First (“OWF”) participant, Lucas County Department of Human Services (“CDHS”) may share information with any federal or federally - assisted program that provides cash assistance or children’s protective services for purposes directly related to the administration of the OWF program.

Further, the CDHS may share information with the Public Children Services Agency (“PCSA”) when making a report of child abuse and neglect, and when the PCSA requires information to conduct an assessment for determining eligibility for Title IV-E.

The CDHS is required to provide current or historic information to assist the PCSA in determining Title IV-E eligibility and/or to assist in conducting a child abuse and neglect investigation. [OAC 5101:2-39-51 (D)]

Further, the CDHS is required to release information regarding a public assistance recipient for purposes directly connected to the administration of the program of a government entity responsible for administering a public assistance program or any other state, federal or federally assisted program that provides cash or in kind assistance or services directly to individuals based on need or for the purpose of protecting children. [O.R.C. 5101.27 (B)(1)]

Further, as permitted by state or federal law, information may be provided to the following parties:

- ▶ Law Enforcement for Investigative Purposes
- ▶ The Participant
- ▶ The Participant’s Authorized Representative, Parent or Guardian
- ▶ The Participant’s Attorney With Written Authorization
[OAC 5101:1-1-03]

The PCSA is required to share information about services provided to children and families, including minor parents, who are also receiving services from the CDHS.

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The following information may be provided without the consent of the OWF participant:

- ▶ Whether An Assessment/Investigation Has Been Initiated
- ▶ Whether The Family Is Currently Receiving Services
- ▶ The Services Provided To The Family As A Result Of Child Abuse And Neglect
- ▶ General Health And Safety Of The Child Who Is The Subject Of The Report Of Abuse And Neglect
- ▶ Whether A Complaint Has Been Filed In Court
- ▶ An Agreed Upon Or Court-Ordered Case Plan

When a PCSA shares information regarding the assessment/investigation of child abuse and neglect, the identity of the reporter may not be shared [criminal ramifications for violation, reference O.R.C. 2151.421 (H)(1)]

Through this document the PCSA formally advises the CDHS that the investigation provided is confidential and written information must be kept by the CDHS in a separate file. [OAC5101:2-39-51 and 5101:2-34-38]

II. SITUATIONS WHICH REQUIRE A SIGNED RELEASE

As permitted by federal or state law, information may be shared with an individual or government entity with a time-limited or ongoing release signed by the OWF participant identifying to whom the information is permitted to be shared. This consent to share information may be revoked by the participant at any time.

All participating agencies to this Plan agree to use the attached *Consent for Release of Information* form. (SEE CHAPTER 200 - APPENDIX 2C)

All parties understand that any information shared through the above release process will not be transferred to a third person or agency without the further written permission of the individual involved or that of his/her parent or legal guardian.

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LCDHS/LCCS COLLABORATION

PURPOSE

To establish the method of collaboration between the LCDHS and LCCS for Self-Sufficiency Contract (SSC) and case plan development with families receiving services from both agencies.

1. Prior to completing or amending a case plan, the LCCS worker will ask the adult family members or minor head of household if they are participating in OWF or obtain the information through CRIS-E.
2. If the LCCS worker determines that adult family members are participating in OWF, the worker will request a copy of the SSC from the LCDHS worker.
3. The LCDHS worker will provide the worker with a copy of the current SSC within five working days of the request. The LCDHS worker will provide any relevant information to the LCCS worker regarding the participant's progress towards meeting SSC requirements or areas of difficulty that the LCCS worker should reinforce through case management services.
4. The LCCS worker will determine whether any contents of the case plan should be incorporated in the case plan and whether any contents of the case plan should be incorporated into the SSC. (The determination of when to add case plan content to the SSC may be based on criteria developed by the LCDHS and LCCS and should be noted here.)
5. The LCCS worker shall inform the LCDHS worker when parenting classes, counseling, substance abuse treatment or domestic violence services are being provided which may meet alternative or developmental activities for the OWF participant.
6. At any time the family receives emergency services through the LCCS, the worker will notify the LCDHS worker of the services provided. At any time the family receives services through the PRC program, the LCDHS worker will notify the LCCS worker.
7. The LCDHS worker or LCCS worker will notify the other when an SSC or case plan is amended.
8. The LCDHS worker or LCCS worker will notify the other if the family is no longer receiving services and the reason.

SANCTIONS

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PURPOSE

To assist the LCDHS and LCCS in collaborating regarding families who are sanctioned from the OWF program. This protocol will establish how the LCDHS and LCCS will share information on cases where components of the LCCS case plan have been incorporated into the OWF self-sufficiency plan and identify what services will be available to families who have been sanctioned.

1. The LCCS worker will use the IQIG (SSN), IQIS (Name) or IQEL (SSN) in CRIS-E to determine if a family is an OWF participant. (The case query subsystem will help workers identify sanctioned assistance group members.)
2. When the LCCS determines that case plan requirements which have been incorporated as part of the self-sufficiency contract have not been met, the LCCS worker will inform the family and the LCCS will immediately forward it to the LCDHS. This notification to the family and the LCDHS will include specific failure or refusal and the specific action needed by the family to be reinstated in OWF. The LCDHS will include this information on the ODHS 4066 "Supplemental Sanction Notice" which informs the family of the actual failure and what the family must do to comply. The LCDHS will be provided a copy of the ODHS 4066 that is sent to the family.
3. When the family has fulfilled the requirements of the case plan, the LCCS worker will notify the LCCS liaison who will immediately forward the information to the LCDHS liaison so that the family can be reinstated.

MINOR PARENT LIVING ARRANGEMENT

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PURPOSE

To establish procedures for the LCDHS, their designee and LCCS in collaborating to implement the new requirements for unmarried minor parent and pregnant minor OWF participants. This protocol will establish a procedure for the LCDHS, their designee and the LCCS to assist unmarried minor parents and pregnant minors who are in receipt of or applying for OWF. **(SEE CHAPTER 200 - APPENDIX 2D-1 thru 2D-6 FOR ADDITIONAL PROCEDURES AND FORMS)**

1. Prior to the next scheduled reapplication for the minor parent or pregnant minor, the LCDHS will identify the assistance groups that could be affected by the policy (i.e., unmarried minor parents or pregnant minor who at the previous reapplication had not been required to live in an adult-supervised living arrangement due to meeting an exemption). The LEAP coordinators will assist in identification since the majority of the minor parents will also be required to attend school.
2. Following the identification, contact will be made to the teen by a method determined by the LCDHS or their designee (e.g., face-to-face). This contact will be made to explain the new policy that will need to be met by the next scheduled reapplication in order for the minor parent to be eligible for OWF.
3. If the minor parent is not living with a parent or specified relative, the LCDHS or their designee will review with the minor the possible relatives with which the minor parent could live. If there are not appropriate relatives and the minor parent or pregnant minor indicates that they will need assistance in finding an appropriate adult-supervised living arrangement, the CDHS or their designee will set a meeting with the minor parent or pregnant minor to help review and pursue options.
4. If there are no relatives, the LCDHS or their designee will discuss with the minor parent any friends or neighbors that could become a legal guardian or an approved adult-supervised living arrangement as determined by the LCCS. The CDHS or their designee will provide information to the minor parent regarding legal guardianship and the adult-supervised living arrangement approval process.
5. If there remains no adult with which the minor parent can reside, the LCDHS in coordination with LCCS will assist the minor parent or pregnant minor in finding an appropriate adult-supervised living arrangement.
6. When an adult-supervised living arrangement for the unmarried minor child or the pregnant minor is identified, the LCDHS or their designee shall contact the Community Specialist at the LCCS to request that an approval for the adult-supervised living arrangement.

NINETY-DAY REUNIFICATION PROCEDURES

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When it appears that a child can be successfully reunified with their parent(s) within 90 days, the parent(s) may continue to be the recipient(s) of the Ohio Works First benefits. The parent(s) will continue to receive the financial benefits, but the parent(s) will not receive Medicaid or Food Stamps for the child. If the child is placed with a relative caregiver, the relative can receive the benefits for the child for 90 days.

1. The worker-of-record and the supervisor will discuss the plan to reunify the child prior to scheduling a staffing. The plan needs to be prioritized to first address the crisis issues that precipitated the child's removal and then address any other problem areas that are evident.
2. If the participant's in the staffing agree that there is a good probability that the child can be reunified within 90 days, then an action plan will be written on the staffing determination sheet that is given to all participants. Immediately after the staffing, the staffing facilitator will forward a copy of the staffing determination sheet to the supervisor of the Entitlements Program unit. The Entitlements Program supervisor will notify the Lucas County Department of Human Services (LCDHS) that the plan is for the child to be reunified within 90 days. **(SEE CHAPTER 200 - APPENDIX 2E)**
3. The worker-of-record will send a copy of the cover sheet of the initial case plan to the supervisor of the Entitlements Program unit. The supervisor of the Entitlement Program will notify the LCDHS that the case plan goal is reunification. This notification must occur at the end of the first thirty days of placement.
4. The case review department will routinely schedule a review staffing nearing the eighth week of placement. The case review clerical staff will ensure that LCCS staff and the CASA/GAL are notified four weeks prior to the scheduled staffing date. The caseworker will notify the family, caregivers and service providers of the review staffing date.
5. The review staffing will evaluate progress and identify any services still needing to be completed prior to the child's 90-day reunification. Immediately after the staffing, the staffing facilitator will forward a copy of the staffing determination sheet along with a copy of the case plan sheet identifying reunification as the goal to the supervisor of the Entitlements Program. The supervisor of the Entitlements Program will notify the LCDHS of the current case plan goal and the staffing decision.
6. The reunification staffing must be held prior to the 10th day in the third month of the child's placement. This must be done in order to ensure that the OWF benefits are not terminated. Immediately following the staffing, the staffing facilitator will forward a copy of the staffing determination sheet to the supervisor of the Entitlements Program, who will notify the LCDHS of the final outcome. The LCDHS must also be notified if reunification does not occur with the 90-day time frame so that benefits can be terminated for the parent(s).

NINETY-DAY REUNIFICATION PROCEDURES

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7. When completing the legal referral, the caseworker must identify that this is a 90-day reunification case, so that a motion can be timely filed in court to ensure that the child is returned within the 90-day time frame. The staffing determination sheet must accompany the legal referral when sending it on to the legal department.
8. The Coordinator of Case Review will track the number of 90-day reunification cases to determine the number of successful reunifications.

OHIO WORKS FIRST BENEFIT CONTINUATION

PURPOSE

To assist the LCCS and LCDHS in collaboratively implementing the statutory allowance for continuation of OWF benefits to families whose children have been removed from their home and the goal is to reunify the family within ninety days.

1. When the child is removed from his or her home and the family is in the OWF program, the LCCS worker shall assess whether or not it is likely that the case plan requirements can be accomplished within ninety days. The LCCS must provide information to the LCDHS regarding the home where the child is placed. This information will be provided to the LCDHS on the child removal/case plan progress form within three working days from the child's removal.
2. Prior to the end of the first month after the child was removed, the LCCS worker will assess the progress of the family towards accomplishing case plan goals including whether the family is cooperating and complete the child removal/case plan progress form. This form will be provided to the LCDHS no later than the last day of the first month following the child's removal.
3. Prior to the end of the second month following the child's removal, the LCCS worker will assess the progress of the family towards accomplishing case plan goals, including whether the family is cooperating and complete the child removal/case plan progress form. This form will be provided to LCDHS no later than the last day of the second month following the child's removal.
4. LCDHS and LCCS agreed time frame as LCDHS will need sufficient time to terminate or reduce benefits, the LCCS will notify the LCDHS whether the child and family have been reunified.

OHIO WORKS FIRST BENEFIT CONTINUATION

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5. Upon notification by the LCCS that the child has been returned home, the LCDHS will notify the home where the child was removed and the home where the child was temporarily placed of the changes that will occur in assistance due to the return of the child.

FAMILY PRESERVATION AND REUNIFICATION SERVICES

Without regard to income standards or benefit limitations referred to previously in this plan, the Lucas County Department of Human Services may provide the following preservation and reunification services to a child and his parent, guardian or custodian as the *AGENCY* determines *NECESSARY* and subject to the availability of unencumbered funds.

- ▶ Diagnostic Services
- ▶ Emergency Shelter
- ▶ Respite Care
- ▶ Therapeutic Counseling
- ▶ Parent Education
- ▶ Short Term and Out-of-Home Care in Foster Family Home, Group Home or Residential Treatment Center
- ▶ Other Services Which in the Judgment of Lucas County Staff Will Prevent the Need to Permanently Remove a Child From His or Her Home or to Facilitate Reunification of a Child to His or Her Home

Application for Family Preservation and Reunification services may be made by an adult family member, his designee or a Public Children Service Agency representative applying on behalf of a child in or being placed in an emergency shelter setting which may include a foster home, group home, or a residential treatment center.

The PRC Program can be used to provide assistance to a family involved with the child protective services system.

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GRIEVANCE PROCEDURE

PURPOSE

Unless redress is governed by State hearing statute, this grievance procedure is to provide a process for receiving, reviewing and resolving complaints or dissatisfaction with the decisions or actions taken by LCDHS, LCCS and LCCSE.

SCOPE

This policy applies to LCDHS, LCCS and LCCSE staff who provide services to families and children under the Plan of Cooperation.

POLICY

All participants receiving services from LCDHS, LCCS and LCCSE shall be provided with an opportunity to have their complaints regarding services reviewed.

PROCEDURE

INFORMAL REVIEW

1. The **Agency Representative** who receives a complaint shall notify their immediate supervisor.
2. The **Supervisor** contacts the complainant (a phone call is sufficient) and tries to resolve the issue. The contact needs to be documented.
3. The **Supervisor**, if unable to resolve the issue, notifies his/her coordinator.
4. The **Coordinator** meets with the caseworker, and supervisor to review the complaint and the attempts at resolution. The coordinator may schedule a meeting to include the complainant if deemed appropriate.
5. The **Coordinator** will prepare a written report on the outcome of the informal review.
6. The **Complainant** will be provided with a copy of the report on the outcome of the informal review and a copy of this policy.
7. The **Coordinator**, if unable to resolve the issue, notifies his/her director, refers the complainant to the agency Ombuds person and provides the Ombuds person with a copy of the report on the informal review.
8. The **Informal Review** process will be completed within 10 days of receipt of a verbal or written complaint.

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GRIEVANCE REVIEW

1. The **Complainant** may initiate a Grievance Review if they are not in agreement with the results of the informal review.
2. The **Ombuds Person** who is not directly in the chain of supervision of any persons involved with the complaint and/or Informal Review will be designated to conduct the Grievance Review. In cases where there is a conflict of interest, another designee will be assigned.
3. The **Complainant** must notify the ombuds person of their intention to request a Grievance Review.
4. The request for a **Grievance Review** must be received by LCDHS, LCCS or LCCSE within 10 days after the completion of the Informal Review.
5. The **Ombuds Person**, within 24 hours of receipt of the written request for a Grievance Review, will contact the complainant.
6. The **Ombuds Person** will schedule the Review within three (3) working days after the written request for a Grievance Review has been received.
7. The **Review** will be held within ten (10) working days from the time the written request is received. An extension of 10 days can be granted if information or parties are not available.
8. The **Ombuds Person** will notify all parties of the date, time and location of the scheduled meeting. The notification is to be provided (5) working days prior to the Review.
9. The **Grievance Review** will be conducted using the following guidelines:
 - ▶ All parties and/or their representative will be allowed a reasonable amount of time to present information or documents.
 - ▶ All parties will present their information in a respectful and non-adversarial manner.
 - ▶ Only authorized persons will be allowed to attend the Review.
 - ▶ The Reviewer may invite additional parties to provide technical assistance.
 - ▶ Violation of the Guidelines can result in a party being excluded from the remainder of the Review.
10. The **Ombuds Person** will prepare a written decision that summarizes the facts, issues, findings and rationale for the decision within five (5) working days after completion of the Review.
11. The **Ombuds Person** will send a copy of the decision to all parties involved in the review and their representatives within (5) working days.
12. The **Complainants** who are not satisfied with the findings of the Ombudsman may request a final meeting with the Director of each agency.
13. The **Central Registry** must be updated if the case disposition/resolution is changed as a result of the grievance review.
14. The party who makes the decision to change a case disposition/resolution must notify Information Services of the change.

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