

Bob Taft  
Governor



Tom Hayes  
Director

30 East Broad Street • Columbus, Ohio 43215  
[www.state.oh.us/odjfs](http://www.state.oh.us/odjfs)

### **OWF/PRC GUIDANCE LETTER NO. 45**

To: Directors, County Departments of Job and Family Services  
Directors, County Public Children Services Agencies  
Directors, Child Support Enforcement Agencies

From: Tom Hayes, Director

Subject: **USING PRC TO SUPPORT HELP ME GROW (HMG)**

The purpose of this letter is to provide guidance on how to use the Prevention, Retention, and Contingency (PRC) program to support the Help Me Grow activities in compliance with Am. Sub. H.B. No. 94.

This guidance supercedes OWF/PRC Guidance Letter No. 19. The major changes in the new guidance includes information on:

- # merging funding at the local level to promote service integration.
- # using the TANF Web Reporting Tool for TANF funded HMG services.
- # using PRC to provide services for new born home visits and children with developmental delays and disabilities.
- # sample HMG language in two local CDJFS PRC plans.

If you have any questions regarding the subject matter, please contact Joel Rabb at (614)466-4815.

JAR:gi

cc:

County Commissioners Association  
ODJFS Assistant Directors  
ODJFS Fiscal Supervisors  
Help Me Grow Regional Coordinators

OJFSDA  
ODJFS O.F.S Bureau Chiefs  
County OFCF Council Chairs  
Ohio OFCF Regional Coord. OFCF Lead Teams

PCSAO  
ODJFS Bureau of County Finance  
County OFCF Council Coordinators

## **Help Me Grow Guidance**

### **Page 2**

## **Help Me Grow—A Governor's Initiative**

In an effort to improve support for families with young children, Governor Taft directed the Help Me Grow (HMG) Program to become the umbrella for services to families with children birth to three. As a part of the budget bill Amended Substitute HB 299, HMG integrates Early Start, Early Start Expansion, Early Intervention, and Welcome Home into a single program so that services can be better coordinated, expanded, and enhanced. To make this possible, the budget directs the funding formerly for Welcome Home, Early Intervention and Early Start be integrated by the administrative agent for the County Family and Children First Council (CFCFC). This letter provides guidance to County Departments of Job and Family Services regarding the implementation of the HMG budget initiative. This letter supercedes and replaces OWF/PRC Guidance Letter 19.

## **Governance of Help Me Grow**

The program operation is supervised by the Ohio Department of Health (ODH). CFCFC is responsible for the county implementation of the Help Me Grow Program requirements. State law requires contracts between the CDJFS and the CFCFC governing the transfer and utilization of PRC funds. Pursuant to section 5108.08 of the Ohio Revised Code, the CDJFS is responsible for establishing eligibility requirements for PRC consistent with Title IV-A, federal regulations, state law, the Title IV-A state plan.

## **ODJFS Role**

The Ohio Department of Job and Family Services (ODJFS) supports the HMG Program with financial support, technical assistance maximizing PRC funds, and program referrals. ODJFS allocates designated PRC funds to each county to support the Help Me Grow Program. In many counties, the CDJFS is the Administrative Agent for the CFCFC.

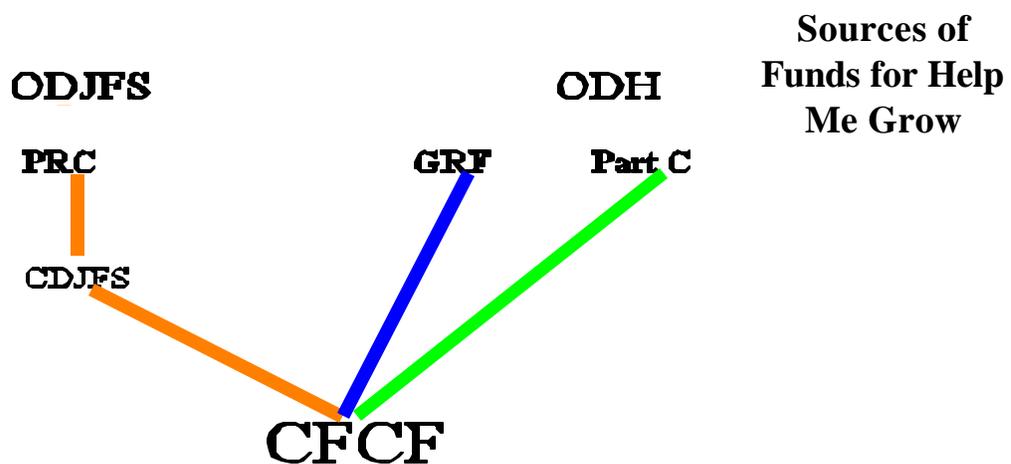
During state fiscal year 2001, the CDJFS, CFCFC, and local service providers have worked closely together to expand and enhance the services to families with children birth to three. By June 30, 2001, Early Start enrolled more than 24,000 families surpassing its goal of 23,000. Over this time period the program grew from 11,000 families to 24,000 - a growth rate of 118%.

## **Importance of Help Me Grow**

The goal of HMG is to enable families to create an environment conducive to the growth and development of young children. The target population for HMG includes pregnant women and families with children under age three. Research has shown that the first three years of life play a critical role in developing strong minds and bodies necessary for future personal growth and social productivity. Investments in these families, while their children are young, will likely produce long-term benefits for communities and our society at large.

### **Merging Funding at the Local Level to Promote Service Integration**

To facilitate this service integration process, all the GRF and Federal Part C funds from the ODH will be sent directly to the administrative agent of each CFCFC. The Federal Part C funds support services for children with diagnosed delays and disabilities. The HMG PRC funds will be allocated to the CDJFS. The GRF funds are made available from the Ohio Department of Health. These funds are the most flexible in the Help Me Grow program. Since the GRF funds are the scarcest, a priority for funding services should be given to PRC and Part C funds.



Pursuant to the budget language in Am.Substitute HB 94 , “local contracts shall be developed between local departments of job and family services and family and children first councils for the administration of the TANF(PRC) funding for the Help Me Grow Program.”

If the CDJFS is the administrative agent for CFCFC, then no agreement for *the transfer* of HMG funding is required. This process enables the administrative agent to flexibly manage the use of PRC funds to support all components of HMG. These components include newborn home visits, at-risk services, and services for children with disabilities or delays.

### **County PRC Plan**

County Departments of Job and Family Services are required by ORC to set eligibility standards and define application procedures for services funded by PRC in their counties. See Legal Brief

02-01 at <http://innerweb/Ols/briefs/brief0201.pdf> and OWF/PRC Guidance Letter Number 13 at [http://www.state.oh.us/odhs/owf/prc/Guidance/letter13\\_1.pdf](http://www.state.oh.us/odhs/owf/prc/Guidance/letter13_1.pdf) to review guidance on this topic.

## **Help Me Grow Guidance**

### **Page 4**

The following requirements apply to all PRC funds used to support HMG:

#### Eligibility

PRC funds for HMG are directed toward low income families including those on OWF cash assistance and those who are not. Most counties now do not segregate the OWF families from other low income families. With the flexibility allowed under PRC, ODJFS encourages counties to write their PRC Plans so that the Plans cover both the OWF families and other low income families outside the OWF population. *We encourage counties to continue to serve all OWF families in the HMG Program including those that have an OWF sanction.* Counties should consult OWF/PRC letter number 13 which provides model guidance on eligibility and applications. Counties should contact their county prosecutor for advice and direction in designing their eligibility process for PRC.

ODJFS recommends that income tests for PRC eligibility not exceed 300% of the federal poverty guidelines. Counties may offer PRC funded HMG services to families with children under age three and to pregnant women, with an income at or below 300% of the federal poverty level. Counties will need to craft the eligibility limits in accordance with their respective PRC plan so that the maximum number of families can be served without exceeding available resources.

The PRC eligibility process must also consider the relationship of the child to the adult caretaker. PRC funds must be used for families where the parents or blood relations are caring for children or non-related parents have legal custody. Counties may serve single, pregnant individuals that do not have other children. *It is important to note that child only cases, where the child is living with a relative or a caretaker with legal custody or guardianship, are eligible for PRC funded HMG services.* Refer to OWF/PRC Guidance Letter #13 for guidance on determining the relationship of the child to the adult caretaker.

#### Application Process

The application process to determine PRC eligibility must be established in the CDJFS PRC Plan. Counties have wide latitude in designing applications, income tests and documenting family relationships to the child. Some counties verify income with actual pay stubs, some have forms to document self declaration, and others use verification from other means tested programs (i.e. Medicaid, Food Stamps, WIC, subsidized child care) to document income eligibility. Some CDJFS agencies actually conduct the PRC eligibility determinations; others delegate this responsibility to other agencies through contract. If the responsibility for PRC eligibility determination is delegated to other agencies, the CDJFS has significant monitoring and oversight responsibilities. See Legal Brief 02-01 at

<http://innerweb/Ols/briefs/brief0201.pdf>.

## **Example PRC Plans**

See attached HMG language taken from PRC plans from Tuscarawas and Washington County Departments of Job and Family Services.

## **Help Me Grow Guidance**

**Page 5**

## **Web Reporting Tool**

The CDJFS is responsible for entering the expenditure and service information into the TANF web reporting tool just like any other PRC service. The TANF Web Reporting Tool identifies the following sub categories for reporting HMG services: Welcome Home Visits for Newborns for welcome home visits, Early Start for services provided to families at risk, Early Intervention for services provided to families with children who have developmental delays or disabilities, and Community Outreach. For a description of these reporting categories see: <http://www.odjfsreporting.com>

The Early Track system captures service information on Help Me Grow. It does not separate out TANF services and it is not linked to the TANF Web Reporting Tool. CDJFS will report to ODJFS summary data on expenditures and numbers of families served in Help Me Grow with PRC funds through the TANF Web Reporting Tool.

## **General Guidance**

ODJFS is working in partnership with OFCF, ODH, and ODMR/DD to help counties develop and expand HMG services. All state partners are encouraged to collaborate with local level administrative agencies, service providers and Family and Children First Councils. By working together, local partners can quickly identify problems and develop solutions which will enhance the success of HMG and its benefit to families and children. If your community has specific program questions regarding HMG, please contact your Regional ODH Program Consultant for HMG. Please contact your regional ODJFS Fiscal Supervisor for HMG fiscal questions. For more specific contract information, please call the Bureau of Program Integration and Coordination at (614) 466-4815.

## **Special Topics**

**Serving Children in Foster Care**—Help Me Grow services are funded from GRF, TANF, and Federal Part C sources. It is appropriate to serve foster and adoptive children in Help Me Grow. **In fact, foster and adoptive families may have children that are entitled to services funded** by Federal Part C dollars. TANF PRC funds, with some exceptions, may not be used for services to children not living with their parents or relatives. Families with non-related children in foster care may receive PRC funded services for up to 180 days as long as there is an active reunification plan. Adults with finalized adoptions or legal custody of non-related children in their homes are considered parents. If a family is caring for an unrelated child, Help Me Grow services could still be provided by non-PRC funds.

**Integrating Funding Streams**–The three funds cannot be merged completely. They are from three different funding sources with different requirements. The Family and Children First Council has the responsibility to assure that the funds work together locally to support its program designs and to make sure that the funds can be tracked back to the three funding sources. PRC funds will be allocated to the CDJFS. The Administrative Agent for CFCFC will receive a GRF subsidy and a Federal Part C Grant. If the CDJFS is not the Administrative agent,

### **Help Me Grow Guidance**

#### **Page 6**

the CDJFS will enter into a contract with the Administrative Agent to reimburse CFCFC for PRC eligible services.

**Using PRC for New Born Home Visits and Children with Developmental Delays and Disabilities**– The design of the Help Me Grow program is to facilitate the use of PRC funds where the families are financially eligible for newborn home visits and the regular home visiting components.

If the child has a diagnosed developmental delay, the family is entitled to services outlined in the Federal Part C program. If the family meets financial eligibility criteria for PRC the county could use either funding source to pay for non-medical services.

**Help Me Grow and Healthchek Coordination** - Coordination between the Help Me Grow and Healthchek programs is encouraged. The intent of this effort is for the state and local CDJFS and ODH staff to coordinate their services so that these programs can assure medical homes and immunizations for low income children.

Opportunities for coordination between the programs might include the following activities:

#### ***Awareness and Information Sharing***

Explore ways for Help Me Grow and Healthchek staff to meet each other and share information as well as service delivery strategies.

#### ***Outreach***

Help Me Grow staff can provide information on Healthchek during their home visits and Healthchek staff can provide information to Help Me Grow staff during the consumer information sessions.

#### ***Referrals***

Help Me Grow staff can refer clients with children identified as having developmental delays to the Healthchek program for assessments and other appropriate services.

**Contracts and Agreements** – All parties are encouraged to read the following federal and state requirements on competitive bidding:

ODJFS Administrative Procedure Manual 4011(6)

Ohio Revised Code

ORC 307.86 (C)

ORC 307.86 (D)

ORC 329.04

ORC 121.37 (B)(4)(a)

**Help Me Grow Guidance**

**Page 7**

Code of Federal Regulations

45 CFR 74.43

45 CFR 92.36 (c)(1)

45 CFR 95.613 (ADP)

7 CFR 277.14 (f)

The CFCFC is responsible for designating an administrative agent. The administrative agent has fiscal responsibilities for the council. The administrative agent with council approval may execute agreements to have some services reimbursed through other partner agencies. If the CDJFS is paying bills on behalf of the CFCFC based on a written agreement with the administrative agent, it should have a contract with the administrative agent that clearly delineates terms and conditions for service reimbursement. The CDJFS would not be required or empowered to reimburse for services not defined in the contract or for ineligible individuals.

We recommend that local parties seek advice from the county prosecutor about competitive bidding as they are planning for the procurement and contracting process. Early consultation will avoid disputes. In fact, we recommend local parties seek advice from the county prosecutor on all legal issues and disputes not just contracting issues.

**Administrative Costs**—The CFCFC may not use more than 10% of the PRC allocation for administrative costs related to the program. Administrative costs of contractors who provide services are included in the unit of service cost and are not counted in the 10% cap. Administrative agents also provide direct services. Administrative costs incidental to providing those direct services may be included in the unit of service cost and are not counted in the 10% cap.

Some of the CDJFS administrative costs can be covered within the 10% cap if it is authorized in an agreement between the CFCFC and the CDJFS. Consult with the fiscal supervisor to assure that administrative costs are properly constructed to avoid issues with program income.

**Redetermining PRC Eligibility**—Counties have broad authority in determining eligibility and setting review periods. Counties are encouraged to have review periods no less than once a year. They must notify clients of their responsibility to report changes. If a family for whatever reason loses financial eligibility for PRC they may continue to be eligible for Help Me Grow Services. For example, if a

family caring for a disabled child loses PRC eligibility, they remain eligible for HMG services under Part C Funding. Children eligible for services under Federal Part C are entitled to those services regardless of income. It would be important to reconsider the funding source rather than terminate the service.

**PRC Funds and Medical Services**--PRC funds may not be used as match for other federal programs. PRC funds cannot be used for medical services unless they are to prevent out of wedlock pregnancy.

**Help Me Grow Guidance**  
**Page 8**

HMG Language - PRC Plans

Tuscarawas County

*Eligibility:* In order to receive PRC benefits and services, a member of the assistance group must be a citizen of the United States or a qualified alien. Eligibility for PRC is based on the assistance group demonstration and verification of need for financial assistance and/or services. The assistance group's net income must be less than or equal to the economic needs standard established for the benefit and service requested. The Help Me Grow Program will include all children from birth to age three (3) who are recipients of any of the following programs: Ohio Works First (OWF), Food Stamps, free lunch program in the schools, Women, Infants, and Children (WIC), as well as, all categories of Medicaid and publicly funded child care. Children not known to the above programs must meet the 200 percent federal poverty level guidelines. The economic need standard is based on federal poverty guidelines measures which shall be updated annually in March, when the federal poverty guidelines are increased.

Washington County

Families with children under age three or prenatal moms who are enrolled via an application in the Washington County's Help Me Grow program are eligible provided household income for either doesn't exceed 300% of FPL and the program and its service components are administered per agreement between Washington County Family and Children First and the Ohio Department of Health. The conditions on Help Me Grow are as follows:

- a. Services could include such items as home visits, transportation (non-cash payments for those not eligible for Medicaid Transportation Program at the WCDJFS), case management/service coordination, information and referral, parenting classes, group activities to enhance parenting skills and build support systems, child development screenings and respite care as examples of services. However, because the PRC Program is funded with federal Title IV-A block grant funds, no medical expenses are covered.
- b. Applications for services will be done by using a special and brief application (see attached) which will be utilized for this service and it will include a self-declared household yearly income which will determine if the household is within the county-determined eligibility range to allow

this service to be provided and has a minor child under age three or PRENATAL MOM in the residence.

c. There will be no requirement to pay back or work off Help Me Grow services. In addition, prior obtaining of PRC for other related items will not affect the receipt of these specific services. Lastly, future eligibility for regular PRC will not be affected due to receipt of these specific funds.

d. Applicants ineligible for Help Me Grow will be titled Applicants Ineligible for PRC in this document.