

**STATE OF OHIO
OHIO DEPARTMENT OF JOB AND FAMILY SERVICES**

**TEMPORARY ASSISTANCE TO NEEDY FAMILIES (TANF) PROGRAM
STATE TITLE IV-A PLAN**

Submitted pursuant to 42 U.S.C. §602

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Section I

OVERVIEW OF OHIO'S TANF PROGRAMS

Overview of Ohio's TANF Programs

In Ohio, the following programs and services are supported through the TANF program.

Ohio Works First (OWF) - OWF is a state-supervised, county-administered program that serves every political subdivision in the State. OWF provides time-limited cash assistance to needy families with (or expecting) children, by furnishing parents or specified relatives with work, training, and other support services they need in order to attain permanent self-sufficiency while meeting the family's ongoing basic needs. Non-time-limited OWF cash assistance is also provided to child-only cases.

Prevention, Retention and Contingency (PRC) - PRC is a state-supervised, county-administered program that serves every political subdivision in the State. The program is designed to provide benefits and services that are not considered assistance in accordance with 45 CFR §260.31. PRC provides ongoing services and nonrecurring short-term benefits designed to accomplish one of the four purposes of TANF by addressing supports needed by working families and by addressing the needs of families with barriers to self-sufficiency. The goal is always to provide the appropriate mix of cash and non-cash services that will enable the family to achieve self-sufficiency. Ohio chooses to provide services authorized by the Title IV-A Plan that was in effect on August 21, 1996. This plan authorizes Ohio to fund certain medical services and certain Child Welfare services with TANF dollars. The specific Title IV-A plan is in Appendix A.

Other TANF-Funded Benefits and Services - Ohio also uses TANF funding to support several different Title IV-A programs or program components which serve TANF-eligible individuals. These programs are authorized either by the Ohio General Assembly or an Executive Order of the Governor. TANF funds must be reasonably calculated to achieve one of four purposes, as indicated by federal law. All of the programs listed are reasonably calculated to meet one or more of the four TANF purposes. The benefits and services provided under this section are not considered assistance as defined in 45 CFR §260.31(a) and are benefits and services that 45 CFR §260.31(b) excludes from the definition of assistance.

Family Supports - A very important component in moving people away from public assistance and toward self-sufficiency is the provision of adequate family supports. As families move into regular, meaningful employment, it is imperative that they are given the opportunity to access support services that help them maintain their jobs. Assistance with buying food, getting health coverage, paying for child care and transportation are all family supports that assist families in their pursuit of success. These are programs that are not TANF funded but, in coordination with PRC and OWF, support families as they pursue self-sufficiency.

Overview of Funding

The Ohio Department of Job and Family Services (ODJFS) has structured Federal TANF funds and State Maintenance of Effort (MOE) funds in a manner consistent with federal and state law, as well as the efficient and effective operation of programs designed to serve the needs of families envisioned in the purposes of TANF. The structure of funding may include the following:

- Segregated TANF funds expended in the TANF program.
- Segregated State MOE funds expended in the TANF program.
- Commingled Federal TANF and State MOE funds expended in the TANF program.
- Separate MOE funds expended on state programs operated outside the TANF program.

To the extent allowable under federal law, the State may transfer funding from the TANF Block Grant to the Social Services Block Grant and the Child Care Development Fund.

Section II OHIO'S TANF PROGRAMS

1. Ohio Works First

Ohio Works First (OWF) is Ohio's TANF cash assistance program for needy families. OWF is a temporary cash assistance program that encourages family self-sufficiency through employment. Participation in OWF requires each work-eligible individual, adult and minor head of household to sign and follow a self-sufficiency contract. The self-sufficiency contract requires each individual to engage in work activities. A 'minor head-of-household' is defined as a minor child who is either: (1) married, at least six months pregnant and a member of an assistance group that does not include an adult; or (2) married, and a parent of a child included in the same assistance group that does not include an adult.

When determining eligibility for OWF, the State requires that the assistance group contain a minor child who resides with a custodial parent, legal guardian, legal custodian or specified relative caring for the child (under Ohio law, guardians and custodians stand *in loco parentis*); or a woman who is at least six months pregnant. There is no resource limit/asset test in the OWF program.

Initial Income Test

The first step in determining whether a family is financially eligible to participate in OWF is the state's initial income test. The initial income test is a modified program eligibility test, similar to the initial eligibility test formerly prescribed by the Aid to Families with Dependent Children (AFDC) regulation. The earned income disregard is not applied at this initial income test.

The initial eligibility standards are annually indexed to fifty per cent of the federal poverty level (FPL) effective July 1 of each year.

Continued Eligibility

If the family's gross monthly income does not exceed fifty per cent of the FPL for the appropriate household size, the family passes the initial income test. The family's eligibility for an OWF cash benefit is determined by deducting \$250 and 1/2 the remainder from the family's gross monthly earned income (the earned income disregard) and deducting any verified non-publicly funded dependent care costs. The family's unearned income is added to the remainder, and the total is compared to the OWF payment standard for the family size. The OWF payment is the difference derived from subtracting the family's countable income from the OWF payment standard for the family size.

Temporary Absence

A temporarily absent individual is considered to be in the home for eligibility purposes under OWF. The absence of a member of the assistance group is temporary if all the following conditions are met:

- The location of the absent individual is known;
- There is a definite plan for the return of the absent individual to the home; and

- The absent individual shared the home with the assistance group prior to the onset of the absence.

A minor child or parent/specified relative who, without good cause, has been, or is expected to be, absent from the home for a period of forty-five consecutive days or longer does not meet the temporary absence requirement for OWF. Exceptions to this requirement are limited to the following good cause reasons:

- Hospitalization (includes inpatient drug and alcohol treatment);
- Detention in a juvenile home until a court commitment;
- Attendance at school;
- Vacationing;
- Trip made in connection with current or prospective employment;
- Shared parenting situations;
- Service in the military when it is the sole reason for absence; and
- Removal of a child(ren) by the Public Children Services Agency (PCSA) if a reunification plan is in place and the parents are cooperating with it. Cash assistance for a child(ren) removed can continue to be provided for up to six payment months after the removal date.

State and Federal Time Limits

An assistance group in receipt of OWF that includes an adult or minor head-of-household is subject to state and federal time limits. In Ohio, the state time limit is 36 months. The 36 months count toward the federal 60-month time limit. After 36 months, the assistance group is ineligible for further payments unless the county department of job and family services (CDJFS) approves an extension of benefits.

There are three kinds of CDJFS-determined extensions: (1) “state hardship;” (2) “good cause;” and (3) “federal hardship.”

Both the state hardship and federal hardship extensions are determined in the same manner and both are subject to a 20% limit, i.e., a CDJFS may exempt up to 20% of the average monthly number of families receiving OWF from the time limit if the CDJFS determines that the time limit is a hardship. An assistance group can receive a state hardship extension any time after the 36-month limit has been reached. Neither federal nor state law define the term “hardship.” In determining whether the time limit is a hardship, the county must look at the totality of the family’s circumstances to determine whether the 36 or 60-month time limit is a hardship. Most CDJFS have developed a list of situations that they consider to be hardship, but they are also to consider the totality of the circumstances if a family's situation does not fit within one of the listed situations the CDJFS has identified.

An assistance group can only receive a good cause extension after a 24-month waiting period following termination of OWF after 36 months. After 24 months have passed, a CDJFS may determine that good cause exists. The CDJFS have also identified lists of good cause reasons for extending eligibility. When the CDJFS determines that good cause exists, the assistance group may be eligible for up to an additional twenty-four months of cash assistance.

After 60 months, the assistance group is ineligible for further payments unless the CDJFS approves a federal hardship extension. The 60-month limit counts the first 36 months plus all state hardship and good cause extension months. Both state and federal time limits count any months of TANF cash assistance received in another state. An assistance group approved for OWF as a result of an extension must meet all eligibility requirements and sign a new self-sufficiency contract. Based on a waiver inconsistency (Appendix B), State and Federal time limits began on October 1, 1997, and are not applied retrospectively to participants who received assistance and services before October 1, 1997.

Benefit Levels

The maximum OWF benefit levels available to assistance groups are based on the assistance group size. Current state law requires that effective January 1, 2009, OWF payment standards be increased annually each January based upon the cost-of-living-adjustment by the Social Security Administration in the previous year. The current OWF payment standards can be accessed at the following URL: <http://jfs.ohio.gov/ofam/pdf/OWF.PRC.Standards.Sheet.pdf>

Ohio Works Now (January 2012 – June 2012)

Ohio Works Now is an additional food benefit issued to employed needy families with children who are receiving food assistance benefits, but are not in receipt of Ohio Works First benefits. Families will receive a monthly notice about their eligibility for Ohio Works Now. Although these additional food assistance benefits will be added to recipients' Ohio Direction Cards, Ohio Works Now will be administered as part of the TANF program with benefits issued from state maintenance of effort (MOE) funds.

School Attendance for Teen Parents

The Learning, Earning and Parenting (LEAP) Program, is a component of OWF. LEAP is Ohio's program to encourage teen parents to remain in school and obtain a high school diploma or high school equivalence diploma. (This program is a continuation of the program previously operated under a waiver, with changes made to comply with federal regulations.)

All teen parents and pregnant teens under the age of 18, or 18 and attending school are required to participate in LEAP. A \$62 attendance bonus is given to the teen for any month that a teen maintains good attendance. Other bonuses paid to LEAP participants include a one-time \$100 school enrollment bonus, a \$100 grade completion bonus and a \$500 graduation bonus.

A \$62 sanction is imposed for any month that a teen does not maintain good attendance. Certain teen parents who are not attending high school or the equivalent are required to participate in an alternative educational or training program. Failure of the teen parent to complete an assessment, enroll in school, attend school or an alternative educational or training program or withdraw from school result in the teen parent's ineligibility for OWF. A teen parent who is 18 years of age and not attending school is required to participate in work activities.

A teen parent caring for a child less than twelve weeks old, or attending home school or Internet school is exempt from participation in the LEAP Program.

Assessment/Appraisal

The goal of OWF is that every family becomes self-sufficient. Prior to the approval of benefits for OWF applicants, the CDJFS must conduct an appraisal of each adult or minor head of household member of the assistance group. The appraisal includes screening for domestic violence, and an evaluation of employment history, education, skills, abilities, interests, and work barriers in order to formulate an employment goal and a plan to achieve self-sufficiency for the individual and the family. The CDJFS also assesses the skills, prior work experience and employability of each participant who is at least 18 years of age, or who is not attending secondary school and who has not completed high school or obtained a high school equivalency certificate.

Self-Sufficiency Contracts

Each work-eligible individual, minor head of household and adult member of the OWF assistance group under 42 U.S.C. 607(i)(1)(A) must enter into a written agreement with the CDJFS. The agreement is called a self-sufficiency contract (SSC). The SSC must be entered into within thirty days of applying and prior to the authorization of OWF benefits or when undergoing a redetermination of eligibility for OWF. The conditions in the SSC should be based on the mandatory appraisal each CDJFS is required to perform when an assistance group applies for assistance. The SSC sets forth the rights and responsibilities of both the assistance group and the CDJFS. Each SSC includes (but is not limited to) the following:

- The assistance group's plan to achieve self-sufficiency and personal responsibility through unsubsidized employment within the time limits specified for participation.
- Work assignments for each work-eligible individual in the family-- including the type of assignment (federally-allowable work activities, and/or alternative activities), the specific assignment and the number of hours of participation required.
- Responsibility of the caretaker member of the assistance group to cooperate in establishing the minor child's paternity and establishing, modifying, and enforcing a support order for the child.
- Other responsibilities that members of the assistance group must satisfy to participate in OWF.
- The consequences to the assistance group for failure or refusal without good cause to satisfy all the responsibilities contained in the SSC.
- Assistance and services to be provided to the assistance group by the CDJFS, the Child Support Enforcement Agency, and the PCSA.
- Other provisions designed to enable the assistance group to achieve self-sufficiency and personal responsibility.
- Procedures for assessing the compliance of both the work-eligible individual(s) and CDJFS

with the terms of the SSC and whether the contract should be amended.

- Procedures for amending the contract.
- The good cause reasons for missing hours of participation.

If the work-eligible individual, adult or minor head of household fails or refuses to comply in full with a provision of the SSC without good cause in accordance with the state's good cause policy, the assistance group is sanctioned in accordance with the state's sanction policy.

ODJFS offers a descriptive self-sufficiency contract model to the CDJFS. The CDJFS are not required to use the model, but must remain consistent with OWF provisions if the CDJFS chooses to adopt its own model. ODJFS has also developed a standardized good cause policy that is applicable statewide.

Pay-for-Performance

Each CDJFS has the option of requiring OWF applicant assistance groups that contain a work-eligible individual to complete a work assignment prior to the authorization of benefits. Job search and job readiness is the only allowable work activity that an applicant assistance group may be assigned. For CDJFS' that choose for work-eligible individuals to complete a job search/job readiness applicant assignment as part of the eligibility determination process, they must make an eligibility determination no later than 30 days following the submission of the application for OWF benefits.

Sanctions

The first failure or refusal without good cause results in OWF ineligibility for the entire assistance group for one payment month or until the failure or refusal ceases, whichever is longer. The assistance group may also receive a reduction in food assistance benefits. The second failure or refusal causes OWF ineligibility for the entire assistance group for three payment months or until the failure or refusal ceases, whichever is longer. The assistance group may also receive a reduction in food assistance benefits. The third or subsequent failure or refusal results in OWF ineligibility for the entire assistance group for six payment months or until the failure or refusal ceases, whichever is longer. The assistance group may also receive a reduction in food assistance benefits. For a third or subsequent work activity failure, the adult work-eligible individual who failed or refused to comply without good cause may also lose Medicaid coverage until he/she complies with the work-activity requirement. Other members of the assistance group remain eligible for Medicaid.

The failure or refusal ceases with the receipt of a compliance form signed by the assistance group member who failed the provision of the SSC.

Assistance groups who are sanctioned remain eligible for publicly-funded child care and support services.

General Work Provisions

An OWF work-eligible individual cannot be assigned to a federal work or alternative activity with

an employer when the employer removes or discharges another person for the purpose of substituting the participant in the person's place. This is true for any of the following circumstances where:

- The person is already employed as a regular, full-time or part-time employee;
- The person has been employed full-time or part-time as a participant in a work activity, or alternative activity;
- The person is, or has been, involved in a dispute between a labor organization and the employer; or
- The person is on a layoff from the same or any substantially equivalent job.

An employer cannot hire a participant to circumvent hiring a full-time employee. Each CDJFS shall have a grievance process to resolve complaints by employers and participants.

Exemptions From Work Activities

There are limited exemptions from work requirements. Child-only cases are exempt and Ohio has taken the state option that exempts a single-parent who is caring for a child under age one from the federal work participation requirements. This is a county option and the county may choose to exempt or assign the individual.

Based on the results of an employability assessment, a work-eligible individual may be exempt from participating in some or all of the hours required for federal work activities.

Work Activities

Each work-eligible individual in the family is required to participate in federally required work activities and/or alternative activities.

Federally Required Work Activities

Ohio conforms with and operates the work activities contained in federal law at 42 U.S.C. § 607(d) and defined under federal regulation at 45 CFR Parts 261 et al. Chapter 5101:1 of the Ohio Administrative Code sets forth the activities to which a county shall assign work-eligible individuals. These rules adopt and augment the federal definitions. Further description of the work activities is found in Ohio's State Work Verification Plan, and is accessible at the following website: http://jfs.ohio.gov/ofam/tanf_info.stm

Alternative Activities

In cases where traditional work activities are unsuitable, and individuals are unable to participate in federal work activities, individuals are placed in alternative activities appropriate to their specific circumstances and needs.

Alternative activities may include, but are not limited to: 1) parenting classes and life-skills training; 2) participating in certified alcohol or drug addiction programs; 3) in the case of a homeless

assistance group, finding a home; 3) in the case of a minor head-of-household or an adult with a disability, active work in an individual written rehabilitation plan with the Rehabilitation Services Commission; 4) in the case of an adult or minor head-of-household who has been the victim of domestic violence, residing in a domestic violence shelter, receiving counseling or treatment related to the domestic violence, or participating in criminal justice proceedings against the domestic violence offender.

Alternative activities may be any activity that moves the family toward self sufficiency. The CDJFS shall establish standards for determining whether the work-eligible individual(s) in the family has a temporary or permanent barrier to participating in federal work activities.

Work After Two Years

Each CDJFS must immediately assess and assign each work-eligible individual in each family to a federal work or alternative activity prior to the approval of OWF benefits. ODJFS and each CDJFS understands that 42 U.S.C. § 602 (a)(1)(A)(ii) requires that each work-eligible individual in the family must be participating in some type of a work activity after receiving cash assistance for 24 months. Since Ohio requires work-eligible individuals to be appraised and assigned to a work activity prior to the approval of OWF benefits all work-eligible individuals should receive an assignment by the time the 24-month period is reached.

Community Service After Two Months

Ohio opted out of the provision in 42 U.S.C. § 602(a)(1)(B)(iv), which requires a parent or caretaker receiving cash assistance to participate in community service after two months if the parent or caretaker is not engaged in or exempt from work activities. The Community Service Activity is not necessary to offer in Ohio because all work-eligible individuals are assessed and assigned to federal or alternative activities prior to the approval of OWF benefits.

Number of Hours Required to Work

Ohio policy regarding required hours of participation comports with federal TANF law set forth in 42 U.S.C. § 607(c), and when applicable, with the Fair Labor Standards Act (FLSA) of 1938 (29 U.S.C. § 201 et.seq.).

The CDJFS has the option of assigning a parent with a child under the age of one to a federal work activity. That family is included in the federal participation rate calculation.

Based on the results of an employability assessment, an individual may be exempted from some or all of the hours required for federal work activities due to family or individual barriers to participation.

Ombudsperson

Ohio statute requires each CDJFS to have at least one OWF ombudsperson. The OWF ombudsperson acts as a liaison between the OWF applicant/participant and the CDJFS.

Work Participation Rates

Ohio will comply with provisions related to work participation rates outlined in 42 U.S.C. § 607.

Domestic Violence Option

Ohio has adopted a domestic violence waiver program in accordance with the provisions set forth in 42 U.S.C. § 402(a)(7). The program became effective January 1, 2008, and includes the federal definition of domestic violence. Ohio's domestic violence waiver program includes universal notification, screening, referral and waiver of certain program requirements.

Each applicant for and recipient of OWF receives notification about domestic violence at each application and reapplication for benefits. Screening occurs during the appraisal interview, the review of eligibility at the expiration of OWF due to state or federal time limits, when good cause for refusal to cooperate with child support is requested by the individual, when there is a failure to comply with the terms of the self-sufficiency contract, and at other times as determined necessary by the CDJFS.

An individual must be referred for counseling and supportive services if the individual responds affirmatively to any screening question at any interval. Ohio's policy also provides that the individual may decline the referral, or may stop counseling or supportive services at any time.

Waiver of OWF/TANF eligibility requirements is possible if cooperation or compliance with the eligibility requirement would make it more difficult for the individual to escape the domestic violence or unfairly penalize the individual. OWF eligibility requirements that may be waived due to domestic violence include cooperation with the child support enforcement agency, participation in a work activity and time limits for receipt of TANF cash assistance.

Ohio provided domestic violence awareness training to CDJFS and child support enforcement agencies. Under a TANF Demonstration Project, the Ohio Domestic Violence Network offered a domestic violence awareness program for CDJFS. Staff from the CDJFS were trained under that demonstration project. From July 2008 – June 2009, a new TANF domestic violence awareness training developed by ODJFS was made available to staff in the remaining CDJFS and to all 88 county child support enforcement agencies.

Application of Waivers

Under 42 U.S.C. § 615, Ohio will rely on one waiver that was previously approved; Ohio implemented its time limit waiver provision in July 1996 (TANF was implemented in 10/96) and the policies were continually applied through September 30, 1997. Beginning October 1, 1997, Ohio aligned its time limit policies with the requirements of 42 U.S.C. § 608(a)(7). Under 45 CFR § 260.75, Ohio submitted the required certification from Governor Bob Taft relating to waiver inconsistencies (see Appendix B).

2. Prevention, Retention & Contingency Program

Services

The Prevention, Retention and Contingency (PRC) program provides benefits and services to TANF-eligible families who are in need of help with essential supports to move out of poverty and achieve self-sufficiency. The program is designed to provide benefits and services that are not

considered assistance under 45 CFR § 260.31. The PRC program offers a broad variety of services and short-term benefits for TANF-eligible families that are designed to accomplish one of the four purposes of TANF.

In addition, Ohio provides services authorized by the Title IV-A Plan that was in effect on August 21, 1996. This plan authorizes Ohio to fund certain medical and certain Child Welfare services with TANF dollars. The specific Title IV-A Plan is in Appendix A.

Prevention services are designed to be given to a PRC assistance group (the PRC assistance group is not necessarily the same as an assistance group as defined in OWF) to divert them from ongoing cash assistance and help them reach self-sufficiency by helping them through the presenting crisis. Retention services are provided to the PRC assistance group to allow an employed member to maintain employment, and thereby achieve or continue self-sufficiency. Contingency services are provided to the PRC assistance group to meet an emergent need which, if not met, threatens the safety, health or well-being of one or more PRC assistance group members.

Among the TANF-allowable services that may be provided to TANF-eligible individuals are: services for unruly and misdemeanor youth; information and referral services to kinship caregivers concerning access to legal services, child care, respite care and financial assistance, adult literacy and child reading services; workforce development and supportive services; micro enterprise development and other entrepreneurship activities; youth job training; job creation and retention services; teen pregnancy prevention services; out-of-wedlock pregnancy prevention services; school readiness services such as counseling and placement, parent education and parent-child activities, peer support groups, and home visits; disaster relief; transportation services; domestic violence services; after-school programs; family preservation and reunification services; mediation services; employer recruitment; early childhood developmental and intervention services; Individual Development Account (IDA) match; and post-secondary education and job training.

PRC Administration

Each CDJFS is required to have a written statement of its PRC program and policy (PRC plan). Each CDJFS must update the county PRC plan at least every two years. A CDJFS may amend its PRC plan at anytime. Effective October 15, 2009, a CDJFS may amend its PRC plan to temporarily suspend operation of its PRC program.

In adopting the PRC plan, each CDJFS must establish or specify all of the following:

- Benefits and services to be provided under the program that are allowable uses of federal IV-A funds under 42 U.S.C. §601 and §604(a), except that they may not be “assistance” as defined in 45 C.F.R. §260.31(a) but rather benefits and services that 45 C.F.R. §260(b) excludes from the definition of assistance.
- Restrictions on the amount, duration, and frequency of the benefits and services;
- Eligibility requirements for the benefits and services.

- Fair and equitable procedures for both of the following:
 - The certification of eligibility for the benefits and services that do not have a financial need eligibility requirement; and
 - The determination and verification of eligibility for the benefits and services that have a financial need eligibility requirement.
- Objective criteria for the delivery of the benefits and services.
- Administrative requirements.
- Other matters the CDJFS determines are necessary.

Each CDJFS determines the number of programs it will administer, and the eligibility criteria including financial eligibility threshold for each program. Each program must meet federal TANF requirements. Each program designed to meet TANF purpose 1 or purpose 2 must have financial eligibility requirements. Maintenance of effort (MOE) funds are only claimed for PRC programs reasonably calculated to accomplish TANF purposes 1 or 2. The funds are commingled and are not separate state programs.

Each CDJFS must ensure that the PRC plan is consistent with Title IV-A, federal regulations, state law, the Title IV-A state plan submitted to the United States Secretary of Health and Human Services, and amendments to the plan.

In addition, each CDJFS must provide ODJFS with a written copy of the PRC plan and any amendments to the plan not later than ten calendar days after the effective date of the plan or amendment. The receipt of these plans does not constitute an approval or disapproval of the policies and practices outlined by the counties and does not represent the concurrence of the State with any claims by the County.

Each CDJFS PRC Plan can be accessed at: <http://jfs.ohio.gov/owf/prc/>

TANF Summer Youth Employment Program (June 1, 2012 – August 31, 2012)

The TANF Summer Youth Employment program uses TANF funding to establish programs that enable youth to gain valuable work experience while earning a paycheck to help meet basic needs. Funding is made available through CDJFS TANF allocations. It is reasonably expected to achieve outcomes under TANF purposes 1 and 2. The program is limited to TANF-eligible Ohio youth and is administered through county PRC programs.

3. Other TANF-Funded Benefits and Services

Ohio also uses TANF funding to support different Title IV-A programs and program components which serve TANF-eligible individuals. These programs are authorized either by the Ohio General Assembly or an Executive Order of the Governor. TANF funds must be reasonably calculated to achieve one of four purposes, as indicated by federal law:

- (1) provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives;
- (2) end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage;
- (3) prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and
- (4) encourage the formation and maintenance of two-parent families.

All of the programs listed are reasonably calculated to meet one or more of the four TANF purposes. Additionally, the benefits and services provided under this section are not considered assistance as defined in 45 CFR §260.31(a) and are benefits and services that 45 CFR §260.31(b) excludes from the definition of assistance.

A. Governor's Office of Faith-Based and Community Initiatives

The Governor's Office of Faith-Based and Community Initiatives (GOFBCI) serves as a clearinghouse of information on federal, state and local funding for charitable services. The GOFBCI encourages and coordinates collaboration between governmental entities and not-for-profit organizations who share a common mission. The GOFBCI has multiple sources of funding, including TANF block grant funds available in state fiscal year 2012.

The long-term goal of the GOFBCI is to strengthen Ohio families, improve child well-being and reduce childhood poverty by directing efforts to expand, enhance and build community capacity. Federal TANF funds (not state MOE funds) are used for the following initiatives:

- *Ohio Benefit Bank*
The Ohio Benefit Bank is a web-enabled, counselor assisted program used by faith-based and community service groups and public agencies at sites throughout Ohio. It allows low and moderate income Ohioans to electronically file federal and state income tax returns, check potential eligibility for assistance programs, provide information and referrals for fatherhood programs, and complete applications for tax credits and benefits such as the earned income tax credit (EITC), food assistance, child care subsidies, home energy assistance, children's health care insurance, and student financial aid, with assistance from trained volunteers. This initiative is reasonably expected to achieve outcomes under all 4 TANF purposes.

Ohio National Guard Marriage Workshops/Youth Camps (July 2012 – January 2013)

This initiative is designed to provide marriage enrichment for Ohio National Guard parents and to provide training, teambuilding and other youth workshops for their children. This initiative is reasonably expected to achieve outcomes under purposes 2 and 3 for the Youth Camps and 4 for the Marriage Workshops.

Moms2Be! (June 2012 – Ongoing)

This initiative is designed to provide case management for TANF eligible women who are new mothers. Services include family planning, and health and nutritional services. This initiative is reasonably expected to achieve outcomes under purpose 1.

Ohio Association of Foodbanks (January 2012 – Ongoing)

This initiative formally known as “Ohio Association of Second Harvest Foodbanks,” provides back packs of food every summer weekend for children who are eligible for the free and reduced lunch program. This initiative is reasonably expected to achieve outcomes under purposes 1 and 3.

Choice Food Pantry (June 2012 – Ongoing)

This initiative assists Grace Missionary Baptist Church in purchasing equipment to open a choice food pantry to assist needy families in the 43201 zip code. This initiative is reasonable expected to achieve outcomes under purpose 1.

After-School All Stars Program (January 2012 – Ongoing)

This initiative provides enhancements to after school enrichment programs. This initiative is reasonably expected to achieve outcomes under purpose 3.

Truly Reaching You Prisoner Reentry Program (June 2012 – Ongoing)

This initiative is an expansion to the Truly Reaching You Prisoner Reentry Program in Akron, Ohio. The program is designed to help TANF eligible parents reintegrate into society by assisting them with the development of trade skills, life skills and positive relationships to help them continue to succeed in their work and personal lives. This initiative is reasonably expected to achieve outcomes under purposes 2 and 4.

B. Other TANF-funded programs

Independent Living Services

TANF funds are used to expand services for individuals who have or will soon emancipate from the foster care system. TANF funds are used to expand services to this population and supplement the federal Chafee Independent Living funds. The services assist individuals in the development of skills needed to successfully transition from youth to adulthood, from foster care to independent living in the community, by choosing healthy and productive options that result in responsible and self-sufficient lives and decrease the incidence of out-of-wedlock births in this population. Individuals served include older children in the custody of the Public Children Services Agency who are likely to remain in custody until age 18 and young adults aged 18 to 21 who have exited the custody of the Public Children Services Agency.

Kinship Permanency Incentive Program (KPI)

The KPI Program was created to promote permanency for a minor child in the legal and physical custody of a kinship caregiver. The program provides an initial one-time incentive payment to the kinship caregiver to defray the costs of initial placement of the minor child in the kinship caregiver’s home. The program may provide additional permanency incentive payments for the minor child at

six month intervals for a total period not to exceed thirty-six months, as long as the child remains in the legal and physical custody of the kinship caregiver.

The KPI Program is administered by the local County Public Children Services Agencies. The kinship caregiver must be the custodian or guardian of the minor child. The gross income of the kinship caregiver's family, including the minor child, cannot exceed 300% of the Federal Poverty Level.

This program is reasonably expected to achieve outcomes under TANF purpose 1. Expenditures under the KPI program are claimed as MOE.

Ohio Association of Second Harvest Foodbanks

Through a memorandum of understanding with the Ohio Association of Second Harvest Foodbanks, the state will claim the value of private donations of food and money received by the foodbanks for TANF-eligible families with incomes at or below 200% of the federal poverty level as MOE in one quarter of each federal fiscal year, starting with federal fiscal year 2009. This program is reasonably expected to achieve outcomes under TANF purpose 1.

Additionally, starting in federal fiscal year 2011, the state will claim the allocable portion of volunteer in-kind time provided to the food banks for administration. The dollar value of the volunteer time is based on data compiled by the Bureau of Labor Statistics. Ohio's volunteer hourly rate is currently determined to be \$18.54. The rate is adjusted annually and can be found at http://www.independentsector.org/volunteer_time

Ohio Fatherhood Initiative Grants

This initiative provides grants to support programs designed to strengthen the role that fathers play in the lives of their children, as well as to support young men and reduce the incidence of premature fatherhood. This initiative is reasonably expected to achieve outcomes under TANF purpose 3, to reduce out of wedlock pregnancies. There is no financial eligibility test for this program. The populations to be served by this initiative are fathers and their young children, and young men at risk of becoming fathers.

Child Care Subsidy Program

In Ohio, TANF funds may specifically be used to support Ohio's state child care subsidy program in the provision of services to:

- OWF families, and
- Low-income employed families with incomes that are at or below the state established income ceiling at the time of application for child care subsidy services and at each redetermination for such services. While the state has the authority to adjust income ceilings in order to manage child care expenditures, per state statute, the ceilings can never exceed 200% of the federal poverty level for the child care subsidy program.

This program is reasonably expected to achieve outcomes under TANF purpose 2.

Early Childhood Education

This program is administered by the Ohio Department of Education (ODE). It provides funding to city, local, exempted village, joint vocational school districts, or Educational Service Centers to provide preschool services for 3 and 4 year old children of income eligible families. The target population served by this program is eligible children who are at least three years of age, not of the age to be eligible for kindergarten, and with family income of 200% or less of the federal poverty level. The program is reasonably expected to achieve outcomes under TANF purposes 3 and 4. Expenditures for this program are claimed by the TANF program as MOE, in accordance with a Memorandum of Understanding between ODJFS and ODE, under which ODE provides data to ODJFS on the number of children served.

Additional Provisions

Fair & Equitable Treatment

Ohio determines eligibility and delivers benefits in a manner consistent with 42 U.S.C.

§602(a)(1)(B)(iii). All applicants and participants are treated in a fair and equitable manner, including those who move to Ohio from another state, those participants who have been adversely affected and claim hearing rights, and, to the extent allowable under Federal law, legal aliens who are not United States citizens.

An appellant who appeals under Federal or State law a decision or order of a CDJFS, shall be granted a state hearing by ODJFS at the appellant's request. A state hearing decision is binding upon the agency and department, unless reversed or modified on appeal to the director of ODJFS or a court of common pleas. An appellant who disagrees with a state hearing decision may make an administrative appeal to the director of ODJFS, who shall review it and may affirm, modify, remand, or reverse the state hearing decision.

Inalienability and Exempt from Execution

OWF and benefits and services provided under the PRC program are inalienable whether by way of assignment, charge or otherwise and exempt from execution, attachment, garnishment, and other like process.

Applicability of other Federal Laws

Under §408(d) of the Social Security Act, the following provisions of law apply to any program or activity funded with TANF funds: (1) The Age Discrimination Act of 1975; (2) §504 of the Rehabilitation Act of 1973; (3) The Americans with Disabilities Act of 1990; and (4) Title IV of the Civil Rights Act of 1964.

The limitation on federal regulatory and enforcement authority at §417 of the Act does not limit the effect of other federal laws, including federal employment laws (such as the FLSA), the Occupational Safety and Health Act (OSHA) and unemployment insurance (UI) and nondiscrimination laws. These laws apply to TANF beneficiaries in the same manner as they apply to other workers.

Confidentiality Provisions

Pursuant to 42 U.S.C. §602(a)(1)(A)(iv), ODJFS takes steps to ensure the confidentiality of all information collected in Ohio's TANF-funded programs. Under the guidelines established that

govern Ohio's TANF plan, no person or government entity shall solicit, disclose, receive, use or knowingly permit or participate in the use of any information regarding a TANF client for any purpose not directly connected with the administration of the TANF program except that to the extent permitted under Federal law, the State will:

- Release information regarding a TANF recipient for purposes directly connected to the administration of the TANF program to a government entity responsible for administering TANF;
- To the extent permitted by federal law, ODJFS and CDJFS shall provide TANF information, except information directly related to the receipt of medical assistance or medical services, for purposes of investigations, prosecutions, and criminal and civil proceedings that are within the scope of the law enforcement agencies' official duties;
- Provide, for purposes directly connected to the administration of a program that assists needy individuals with the costs of public utility services, information regarding a recipient of TANF to an entity administering the public utility services program;
- Provide information to the following persons: the recipient, an authorized representative, a legal guardian of the recipient, and the attorney of the recipient, if the attorney has the recipient's written authorization; and
- Provide information only in accordance with the written authorization.

To the extent permitted under federal law, the State may do both of the following:

- Release information about a TANF recipient if the recipient or the recipient's guardian gives voluntary, written authorization; and
- Release information regarding a TANF recipient to a 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 to a government entity responsible for administering a children's protective services program.

Out-of-Wedlock Pregnancies

Ohio's goal is to reduce the number of out-of-wedlock births by at least 1% per year, thus reducing the illegitimacy ratio. Ohio hopes to achieve this reduction through a number of initiatives.

Because Ohio's LEAP program works closely with the teen parent population, another desired outcome of the LEAP program is the reduction of teen births and out-of-wedlock births.

The CDJFS participate in a community planning process to determine the specific needs of their communities and address those needs through the CDJFS PRC plans. As a result of this process,

many CDJFS have developed relationships with local health departments and other agencies to develop strategies aimed to reduce the number of out-of-wedlock births.

Better access to Medicaid services through outreach also contributes to this reduction.

Statutory Rape

Pursuant to 42 U.S.C. §602(a)(1)(A)(vi), the State operates a public outreach program related to statutory rape. The Ohio Attorney General's office provides Victim's of Crime Act (VOCA) funding to programs that collaborate with community agencies to best respond to victims of sexual assault.. These programs include those that address sexual assault and domestic violence prevention and services for men and women.

Treatment of Individuals Moving From Other States

For the purposes of benefits and services offered under Ohio's TANF-funded programs, Ohio treats individuals who have moved from other states within the last twelve months no differently from residents who have resided in the state for more than twelve months.

Treatment of Aliens

ODJFS provides OWF cash assistance, PRC and other TANF-funded services and benefits to qualified aliens to the extent allowable under Federal law, and in the same manner as they are provided to residents of Ohio.

Ohio's Long-Term Direct Service Workforce Initiative

Ohio faces an overall health workforce shortage at a time when changing demographics will place greater demand on the health delivery system, and more consumers want to receive services and supports in home-and community-based settings. The issues surrounding the direct service workforce and consumers exist within the broader context of health workforce needs in Ohio and nationally. The goal of this initiative is to unify our efforts across state and community agencies related to the education and training, credentialing, registration, wages and career advancement opportunities of the direct service workforce to address these very issues.

Am. Sub. H.B. 119 of the 127th General Assembly created a unified budget workgroup chaired by the Director of the Department of Aging, under the Unified Long-Term Care System workgroup, the Workforce subcommittee made the following recommendations which were approved and are currently being worked on:

1. Create a Direct Service Workforce Consortium.
2. Use the Consortium to develop a multifaceted communications strategy to help connect system stakeholders to resources, programs and data, and to link direct service workers with potential long-term care service and support provider employers.

3. Conduct a long-term care system asset mapping process that identifies courses within Ohio's university system that match the core and specialized skills, creating a "stackable" infrastructure where workers can apply their direct service coursework to health and human service degree programs.

4. Commission a study to determine the relationships (including strengths and limitations) between existing reimbursement models and efficient long-term care service delivery.

The Ohio proposal is to work together, as a unified state government, to lead the implementation of a comprehensive and flexible education and training system for direct service workers in all settings and sectors.

4. Family Supports

The following support services are offered to individuals to help them maintain their jobs:

- **Medicaid Eligibility.** To the extent allowed by law, Medicaid eligibility is aligned with eligibility for the OWF program, so that all participants have access to quality health care. Upon leaving OWF, former participants may have up to one year of extended Medicaid eligibility to help them make the transition from public assistance to self-sufficiency. Additionally, many families who are diverted or sanctioned from public assistance may still be eligible for Medicaid through the Ohio Healthy Start and Healthy Families programs.
- **Transportation.** OWF work participants must have access to employment opportunities in order to successfully enter and remain in the labor force. For this reason, state law requires each board of county commissioners to develop a written transportation plan that establishes policies regarding the transportation needs of low income residents of the county seeking or striving to retain employment. In developing the transportation plan, the board is required to consult with various entities within the county including the CDJFS.
- **Child Care Assistance.** Reliable child care is essential for families to obtain and retain long-term employment. In addition, families participating in employment and training programs require child care assistance. For these reasons, OWF participants with children under 13 years old are eligible for subsidized child care, with the subsidies varying according to the income of the assistance group. Child care is guaranteed to OWF participants and to families who leave OWF for employment for up to one year, or until their income exceeds 150% of the federal poverty level. All families with incomes up to the state established income ceiling may be eligible for non-guaranteed child care assistance. The state child care subsidy program is funded with Ohio General Revenue, CCDF, TANF and SSBG funds.
- **Food Assistance.** Participating OWF assistance groups are considered categorically eligible for participation in the Ohio food assistance program. Additionally, individuals leaving OWF may continue to be eligible if their income remains below 130% of the federal poverty level and they meet all other eligibility criteria of the Food Assistance program. Ohio expanded categorical eligibility to cover the four purposes of the TANF block grant in accordance with 7 CFR § 273.2(j)(2)(i)(C).

- **Service Integration.** The CDJFS are proactively involved in local service integration to serve TANF eligible families. Each county is required by Ohio law to have a Family Services Planning Committee to provide advice to County Commissioners on implementation, administration, and evaluation of social service programs in the county. In addition, each county is encouraged to engage in a community planning process. These efforts are designed to help counties determine the needs in the county and to develop goals and strategies necessary to serve those needs and meet those goals. These efforts are intended to link public and private service providers with needs of low income families and employers.

Section III GOVERNANCE

State-County Relationship

With the provision of TANF-funded services (i.e., OWF and PRC) in Ohio, each Board of County Commissioners is provided TANF allocations that must be used in accordance with state administrative rules. State administrative rules require counties follow all applicable federal and state law including, but not limited to, federal regulations and Office of Management and Budget circulars.

The purpose of the state administrative rules is to establish requirements governing reporting, cash management, audits, allowable use of funds, and other requirements to provide accountability for the use of financial assistance awarded by ODJFS.

Community Plans

Each Board of County Commissioners must establish a County Family Services Planning Committee to address the service needs of the county and make recommendations to the County Commissioners. The Planning Committee is encouraged to develop a County Community Plan designed to identify the county's goals and objectives under the OWF and PRC programs, and the strategies the county will utilize in achieving desired outcomes. While the plan is the end product and ultimately becomes the county's road map, it is the planning process that produces the greatest benefits for the community. The involvement of community stakeholders may maximize the utilization of resources and lead to consensus on strategies outlined in the plan.

Other TANF-Funded Benefits and Services

Ohio's other TANF-funded benefits and services are administered in accordance with respective interagency agreements or contracts. A more detailed discussion of these is provided in Section II.

APPENDIX

- A. Title IV-A State Plan in effect on August 21, 1996
- B. Governor's Letter and Certifications regarding Waiver Inconsistencies