

Monroe County

**Prevention Retention Contingency Policy
August 3, 2015**

**Monroe County Department of Job & Family Services
100 Home Ave.
Woodsfield, Ohio 43793
(740) 472-1602**

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Guidelines for PRC Assistance

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APPENDIX A: Non-discrimination, ADA, Limited English Proficiency, Citizenship, SSN, Discrimination complaints

Introduction

Section 5108.04 of the Ohio Revised Code requires each County Department of Job and Family Services have a PRC Plan which is updated at least every two years. Monroe County Job and Family Services is able to modify, terminate, establish new policies, and temporarily suspend PRC Services as necessary.

In 2009, a reduction in overall state funding sources required services provided through the PRC Program be prioritized according to the level of need. In an effort to preserve the safety and well being of children and families, the Monroe County Department of Job and Family Services has developed a plan which supports Child Welfare, Project Partners, Relocation Program, Summer Youth/Youth Activity, Back To School Programs, and Higher Educational Transportation Program..

This modified PRC Plan outlines services, eligibility requirements, and other definitions specific to Monroe County for Monroe County residents. This Plan has been developed, reviewed, and recommended by the Monroe County Board of Commissioners, and the Monroe County Department of Job and Family Services (MCDJFS). It is updated at a minimum every biennium and notice is posted in the newspaper offering public comment on the services outlined. The Monroe County PRC Plan was developed in compliance with Sec 5108.04 of the Ohio Revised Code.

PREVENTION, RETENTION AND CONTINGENCY (PRC) PROGRAM

The Monroe County Department of Job and Family Services strives to provide comprehensive services that are designed to promote personal responsibility, family stability, economic security, and self-sufficiency.

The Monroe County Department of Job and Family Services will operate a Prevention, Retention, and Contingency (PRC) Program designed to provide benefits and services to needy families and low-income employed families who are in need of help with essential supports to move out of poverty and become self-sufficient. These supports include non-recurrent, short-term, crisis-oriented benefits and, ongoing services that are directly related to the four purposes of the TANF program which does not meet the federal definition of assistance. Non-recurrent, short-term assistance addresses discrete crisis situations which do not provide for needs extending beyond four months. These benefits and services are consistent with the federal definition of “non-assistance” as found in 45 C.F.R. 260.31 (b). The definition of “non-assistance” includes:

1. Non-recurrent, short-term benefits that:
 - a. are designed to deal with a specific crisis situation or episode of need;
 - b. are not intended to meet recurrent or ongoing needs; and
 - c. will not extend beyond four months.
2. Supportive services such as child care and transportation provided to families who are employed;
3. Services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support.

PRC assistance will be authorized with the expectation that the PRC assistance group will then be able to function without additional agency help. Services are provided to an assistance group to **prevent** them from relying on cash assistance and guide them to self-sufficiency by helping them through the presenting crisis. Services are also provided to a PRC assistance group to help members **retain** employment, and thereby, to achieve or continue self-sufficiency. In addition, services are provided to a PRC assistance group to meet a presenting or **contingent** need which, if not satisfied, threatens the safety, health, or well-being of one or more PRC assistance group members.

Assistance Group Composition

PRC benefits and services are available to a family assistance group (AG) which includes a minor child under age 18 and a full-time student or a pregnant individual who is at least six (6) months pregnant as defined in the Ohio Revised Code. Household composition will include

all in the household who will derive a direct benefit from the PRC. **Some** PRC benefits and services are also available to the non-custodial parent of a minor child receiving assistance, who lives in the county, but does not live in the same household as the minor child. An eligible family must consist of a pregnant individual who is at least six (6) months pregnant or a minor child who resides with a parent, caretaker relative, legal guardian or legal custodian.

For the purpose of clarification, the non-custodial parent of a minor child receiving assistance means the child must be: (1) residing in a household that is in receipt of cash assistance, food stamps, or the Ohio Medical card; or **(2) the non-custodial parent must either be paying, or be complying with a seek work order on behalf of the minor child.** The non-custodial parent must be a resident of Monroe County and must also meet the economic need standard established for the benefits and/or services requested. It shall be the responsibility of the non-custodial parent to provide necessary documentation to verify they are the non-custodial parent of a minor child receiving assistance as outlined in this paragraph.

A child may be “temporarily absent” from the home yet the child and his/her family may still qualify for PRC. The absence of a member of the assistance group is temporary if the individual has been absent for no longer than 45 consecutive days, 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. An exception to the 45 consecutive days applies when a child is removed from the home by the children services agency due to abuse, neglect or dependency if the agency indicates there is a reunification plan to return the child to the home within six months. During this period, the child is considered to be residing with the parent, caretaker relative, legal guardian, or legal custodian. An eligible family may also consist of a minor child residing with a parent, caretaker relative, legal guardian or legal custodian and other members of the household who may or may not be related to the minor child, as these people may enhance the family’s ability to achieve economic self-sufficiency.

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 as defined in Section 5101:1-2-30 of the Ohio Administrative Code.

Eligibility for PRC is dependent upon the assistance group’s demonstration and verification of need for financial assistance and/or services, and whether the agency determines that provision of PRC will satisfy the presenting needs. In order for eligibility to be determined, the gross income of the assistance group must be compared to the economic need standard established for the benefits and services requested. The economic need standards will be based on Federal Poverty Guideline measures which will be updated as the Federal Poverty Guidelines are revised. When determining eligibility for the PRC assistance group to receive benefits or services, the assistance group’s income must be equal to or less than the economic need standard. See the attached Federal Poverty Guideline Chart and List of Services and/or Benefits for Monroe County.

Assistance Groups (AG’s) with striking members shall be ineligible for PRC unless the AG was eligible for benefits the day prior to the strike and is otherwise eligible at the time of

application. For PRC purposes, a “striker” shall be anyone involved in a strike or concerted stoppage of work by employees (including a stoppage by reason of the expiration of a collective bargaining agreement) and any concerted slowdown or other concerted interruption of operations by employees. Examples of non-strikers who could be eligible for PRC include (1) employees whose workplace is closed by an employer in order to resist demands of employees (e.g., a lockout); (2) employees unable to work as a result of striking employees (e.g., striking newspaper pressmen preventing newspapers from being printed and, consequently, truck drivers who are not working because there are no papers to deliver); and (3) employees who are not part of the bargaining unit on strike not wanting to cross a picket line due to fear of personal injury or death. Pre-strike eligibility shall be determined by considering the day prior to the strike as the day of application and assuming the strike did not occur.

If the applicant for PRC, or any other adult in the PRC household, has an outstanding OWF/FA/Child Care overpayment, the person with the overpayment must enter into an agreement with the agency to start repayment of the outstanding overpayment. If payments are not maintained, any subsequent PRC requests may be denied. If the applicant or any other adult in the PRC household, has an outstanding PRC, that PRC must be paid in full before another PRC will be issued. No PRC assistance with heating and electric will be issued during the HEAP program. If an individual has utilized the relocation services under this PRC plan in Monroe County, they will not be eligible for PRC relocation again.

Repayment

For some selected benefits, a “Repayment Agreement” must be signed with the Monroe County Department of Job and Family Services prior to PRC issuance. The PRC assistance group has some options concerning the repayment of the PRC funds.

For those prevention services, retention services, and/or contingency services that require repayment, the PRC assistance group may elect 1) regular, predetermined payments; **or** 2) perform community service; **or** 3) a combination of 1 & 2 above.

The Monroe County Department of Job and Family Services reserves the right to waive the repayment requirement for a household if there are extenuating circumstances.

*Community service hours will be determined by the dollar amount of PRC received, divided by the current minimum wage.

PRC is restricted to timeframes outlined in the following service chart. PRC ineligibility will be extended indefinitely for those households that contain an adult who received a previous PRC payment as an adult which was not fully repaid by any of the repayment methods listed above. Failure to repay may result in legal action. The PRC Repayment Agreement outlines the specific guidelines for repayment.

Note: Households that have not met the conditions of repayment for PRC benefits may still remain eligible for selected services and/or benefits under this plan. Those households that have not met the conditions of PRC repayment will still be eligible to receive

the following services in Monroe County **provided that all other PRC eligibility criteria is met**: Child Welfare Services, and Summer Youth / Youth Activity Program, Monroe Co. Public Transportation, Project Partnership and YES.

Income

The total gross income, both earned and unearned, of all members of the PRC assistance group will be counted, with the exception of earned income of a minor child. This includes all income which is normally exempt or disregarded when determining eligibility for Ohio Works First (OWF) or Disability Assistance (DA). All income received by the PRC assistance group during a 30-day budget period will be considered when determining financial need. The 30-day budget period begins thirty (30) days prior to the date of the PRC application and ends on the application date, unless that time period does not accurately reflect the expected income. In that instance, the income that is projected to be received within a 30-day budget period which begins on the date of the PRC application may be used.

For cases in which the income cannot be accurately obtained, the agency will implement practices that are reasonable and prudent when determining countable income. A signed ODHS 7341, "Applicant/Recipient Authorization for Release of Information" will be obtained from the applicant for an inquiry.

Once the release is received, verification which is obtained by telephone will contain clear documentation in the PRC assistance group record concerning the name and position of the supplier of the information, the date the verification was obtained, the amount of the verified income, and the name of the individual who obtained the verification. More stringent verification will be required when PRC benefits and services involve a direct monetary gain by the applicant and opportunities for fraud are prevalent.

Unearned Income

Examples of unearned income which will be counted will include, but may not be limited to, the following:

- Alimony and child support
- Regular/recurring royalty lease income
- Lump-sum payments (incl. tax refunds and if rec'd during the 30 day timeframe)
- Unemployment Benefits
- Pension and Retirement Benefits
- Strike Benefits
- Rental Income
- OWF, DA, or Supplemental Security Income (SSI) payments

Note: These are examples only and are **not** meant to be an all-inclusive list.

Earned Income

Earned income is income in which the assistance group member must perform some type of labor or service to receive it. Examples of earned income which will be counted may include, but may not be limited to, the following:

- Earnings from work as an employee
- Earnings from self-employment
- Strike benefits if striker is required to perform services in order to receive them
- Training allowances

Note: These are examples only and are **not** meant to be an all-inclusive list.

Residence

PRC benefits and services are available only to residents of Monroe County, unless otherwise noted. Residence is established by living in the county voluntarily with the intent to remain permanently or for an indefinite period. All applicants for PRC benefits and services will be required to provide verification of residency.

Ineligible Family Assistance Groups

According to Federal and State law, the following assistance groups are **not** eligible for PRC:

1. Single people, childless couples and parents without a minor child (with exception that a non-custodial parent of a minor child who is ordered into the Employment Program by a Court within Monroe County or by the Monroe County Child support Agency (MCCSEA) and is complying with the Employment Program to find a job is eligible) **or paying their monthly obligation.**
2. Households containing a fleeing felon.
3. Individuals ineligible for other programs, due to non-compliance with the terms of their assistance. **(examples include OWF sanction, FAET sanction, not complying with a prior PRC repayment agreement or an overpayment agreement; FAET recipients that are sanctioned must have served the minimum sanction period before eligible and must sign a compliance form.)**
4. **Pursuant to ORC section 5101.83 and OAC rule 5101:1-23-75, PRC benefits and services may not be provided to a family that fraudulently received benefits under the OWF and/or PRC programs until a member of the assistance group repays the cost of the fraudulent assistance.**
5. Because the PRC Program is funded with federal Title IV-A block grant funds, no medical expenses for applicants are covered except pre-pregnancy family planning services.

6. Households containing any adult or minor head of household who quits a job would be ineligible for a 90 day period from the quit-date, except where good cause has been established per Ohio Revised Code (ORC) 5107.26.
7. Households containing any adult or minor head of household who has been fired within 90 days of application, due to willful actions on the employees part to cause termination.
8. Residence outside of Monroe County, Ohio.
9. Any individual that is an illegal alien.
10. All minor parents or pregnant minors who are not residing in an adult supervised setting.

Scope of Benefits/Services

At the time of application, all individuals that submit a PRC application for services will be informed in writing of their rights to request a state hearing. All PRC applications will have a JFS 04059 "Explanation of State Hearing Procedures" form attached.

The attached chart lists the scope of benefits and services provided by the Monroe County PRC program. The chart also lists the assistance groups served, the economic need standards for the particular benefit/service, caps on benefits/services, the targeted groups, and whether repayment is required. The targeted groups are used to customize service delivery specific to the family's circumstances.

PRC payments will be limited to the amount actually required to meet the presenting need. Client has to present a past due bill stating that services are going to be disconnected/delinquent. This bill can not be 3 or more months delinquent. See Attached Chart.

Any assistance received by an adult member of the household under another Ohio county PRC program within the past twelve (12) months will be taken into consideration when determining eligibility for PRC services in Monroe County. The maximum dollar amounts stated above will not be exceeded between all the counties during the twelve (12) consecutive month period.

In addition, if another Ohio county had conditions (i.e., repayment) on receipt of their PRC benefits, those conditions will continue in effect in Monroe County if known to the agency.

Standard of Promptness

The intent of this program is to provide and authorize benefits and services within five (5) working days of the receipt of a signed application and all the required documentation necessary to process the application (i.e., pay stubs, residency verification, etc.). In some

instances, this five-day time frame may need to be extended due to unavoidable delays on the part of the applicant or the agency.

The five-day standard of promptness is the time frame that the Monroe County Department of Job and Family Services will strive to meet and is intended to stress the importance of dealing with PRC applications in an efficient manner. The agency will not deny any PRC application due only to the expiration of the five-day period. The agency has 30 days to process all applications. All applications past 30 days, with no client cooperation, will be terminated.

When the five (5) day time frame cannot be met, the assistance group record will include documentation of the case activity on the PRC application in order to provide a clear explanation of the unexpected or unavoidable delays in processing the application.

Community Resources

The availability of resources within the local community (Monroe County and the immediate surrounding area) will be explored prior to the authorization of PRC. A PRC assistance group shall apply for and utilize any program, benefit or support system which may reduce or eliminate the presenting need.

Agency personnel authorizing PRC will be aware of the community resources that could assist a family in need of immediate services. The knowledge of those resources that are available will assist staff in determining if any other means within the community may be used to meet or help meet the presenting needs. Attempts to locate community resources and arrangements made with other service providers will be documented in the PRC assistance group record. One denial letter is required by any local community service to process PRC applications.

Applicant Responsibility

An applicant for PRC is responsible for completing all necessary documents, furnishing all available facts and information, and cooperating with the agency in the eligibility determination process. In addition, an applicant must utilize available income and resources in meeting the presenting need. This includes ongoing assistance programs such as OWF, DA, SSI and food stamps, as well as Unemployment Compensation, Social Security, and special energy programs.

There will be no PRC eligibility if the assistance group fails to make use of available income or resources that are sufficient to meet all or a portion of the presenting need.

Application

The Monroe County Department of Job and Family Services has developed a "Prevention, Retention, and Contingency (PRC) Program Application" for use when a family is applying for PRC benefits and services.

A family's application for OWF will serve as the application for PRC services.

The application and any other information and/or documentation gathered during the eligibility determination process will be maintained in a separate assistance group case file, even if the assistance group is in receipt of ongoing OWF, Medicaid, and/or Food Stamps. The separate assistance group folders will be maintained for all PRC applications and related verifications.

Eligibility factors, time restraints, and amounts available to pay for the various benefits and services covered will be explained. Anyone applying for PRC services will receive appropriate information about, referrals to, and access to Medicaid, Food Stamps, child care assistance and other programs that provide benefits that could help them successfully transition to work. In addition, the voter registration application will be made available to persons who are applying for and/or receiving assistance through the PRC program.

Any applicant/recipient who gives fraudulent information in order to receive PRC benefits or services will be subject to overpayment and recovery procedures by the Monroe County Department of Job and Family Services' Benefit Recovery Unit.

Note: When the applicant for PRC, or any other adult in the PRC household, has an outstanding OWF/FS/PRC/Child Care overpayment, the assistance group will not be eligible for PRC assistance until the overpayment is paid in full.

Services and benefits will be provided which directly lead to, or can be expected to lead to, the family in becoming self-sufficient by accomplishing one of the four purposes of TANF:

1. To provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives;
2. To end the dependence of needy parents on government benefits by promoting job preparation, work and marriage;
3. To 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. To encourage the formation and maintenance of two-parent families.

Notice of Approval/Denial

If it is determined that an application for PRC is approved, the ODHS 4074, "Notice of Approval of Your Application for Assistance", or a comparable agency-specific approval form shall be mailed or otherwise delivered. If it is determined that an application for PRC is denied, the ODHS 7334, "Notice of Denial of Your Application for Assistance", or a comparable agency-specific denial form shall be mailed or otherwise delivered.

Once eligibility for PRC is established, authorization shall occur and a payment for the benefits or services will be generated. Authorization may occur at any time during the period beginning on the date that PRC is approved. As long as payment is authorized within thirty (30) days, the actual payment(s) will be made to the vendors according to the procedures in

place for the Monroe County Department of Job and Family Services.

Any programs that provide ongoing services (such as WIA services, etc.), a reapplication will be completed once per year in order to establish financial eligibility for ongoing services.

All PRC payments will be made to the vendor. Any deposits made directly to a vendor, and later returned, are to be returned to the Monroe County Department of Job and Family Services instead of the client. If a deposit is returned to the client, the client will be responsible to repay the full PRC amount.

The chart that follows includes the List of Services and/or Benefits that are available under the Monroe County PRC Program. The chart is not intended to be an all-inclusive list. The agency will review each PRC application on a case by case basis.

Program Operation

To ensure fair and equitable treatment of families applying for PRC, the program will be continuously in operation according to the standards of policy and procedure as set forth within this document. The covered benefits and services or the amounts specified for the benefits and services listed in the section detailing the scope of coverage will not be reduced, limited, or restricted unless the program is modified.

Monroe County reserves the right to modify, suspend or terminate the PRC Program at any time. Modifications may encompass any or all areas of the county PRC Plan. Any modification or termination of the PRC Plan will be put in writing and forwarded to the Monroe County Commissioners and the Ohio Department of Job and Family Services with an established effective date. Monroe County reserves the right to modify, suspend, or terminate PRC services or eligibility requirements for any reason, including (but not limited to) reduction of funds, changes in State or Federal regulations, and the need to address appropriate emerging needs within the Agency. ~~In emergency situations, the Director has the authority to approve any application.~~ **Benefits and services to be provided under the program that are allowable under 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) exclude 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 benefits and services.**

The Monroe County Department of Job and Family Services agree to implement the Prevention, Retention and Contingency (PRC) Program in Monroe County in accordance with the guidelines outlined in this plan.

This Prevention, Retention and Contingency (PRC) Program Plan shall replace all prior versions of the plan for Monroe County.

Effective date of this amended plan: August 3, 2015

Jeanette Harter, Director
Monroe County Dept. Job and Family Services

Date

Monroe County Commissioners

Date

Date

Date

**Monthly Federal Poverty Guideline
Effective January 22, 2015**

The Monthly Federal Poverty Guideline (FPG) measure is used to determine income eligibility for the Prevention, Retention, and Contingency (PRC) program. The total gross countable income of all members of the PRC assistance group must be equal to or less than 100%, 150%, 200%, or 300% of the monthly FPG amount for the appropriate assistance group size.

| Assistance Group Size | 100% Monthly FPG | 150% Monthly FPG | 200% Monthly FPG | 300% Monthly FPG |
|------------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| 1 | 981 | 1472 | 1962 | 2943 |
| 2 | 1328 | 1992 | 2655 | 3983 |
| 3 | 1675 | 2512 | 3349 | 5023 |
| 4 | 2021 | 3032 | 4042 | 6063 |
| 5 | 2368 | 3552 | 4735 | 7103 |
| 6 | 2715 | 4072 | 5429 | 8143 |
| 7 | 3061 | 4592 | 6122 | 9183 |
| 8 | 3408 | 5112 | 6815 | 10223 |

For families with more than 8 persons, add \$4,160.00 per year for each person.