

Office of Family Assistance
Ohio Department of Job and Family Services

PRC Reference Guide

Introduction

The Prevention, Retention and Contingency (PRC) Reference Guide is intended to be a tool for counties to refer to when developing their PRC programs. It is a culmination of efforts stemming from a request by the Ohio Job and Family Services Directors Association (OJFSDA) to condense 39 Ohio Works First (OWF)/PRC Guidance Letters, written over 7 years, into one source of information for counties and other interested persons about PRC. The intent is to create a concise, accessible and understandable tool to help counties with their work.

This guide provides local county agencies and community stakeholders with policy guidance regarding the requirements and opportunities of the PRC program. The program was created by the Ohio General Assembly, but is governed by federal law and regulation as well as state law because one of the main sources of funding is Temporary Assistance for Needy Families (TANF), a federal block grant issued to states to tailor their welfare programs to meet individual states' needs. As a result, this guide sets forth the requirements of the federal law and regulations governing TANF that relate to the PRC program, and state law on PRC and policies developed over time. In addition to federal and state requirements, this guide offers many suggestions regarding how to assess the needs of the community, determine the goals of the PRC program, and identify specific benefits and services that the community can provide.

Federal and state grant management and procurement requirements apply to the PRC program, but are not included in this guide. Requirements are set forth in the Fiscal Administrative Procedure Manual which can be found on the Ohio Department of Job and Family Services (ODJFS) website. Counties are encouraged to work with the ODJFS Office of Fiscal and Monitoring Services to determine how to account for the program and how to apply federal procurement requirements.

This guide is not a comprehensive review of the TANF program. Also, we did not anticipate every question regarding allowable PRC spending. If you have any questions regarding the PRC program, contact the ODJFS Office of Family Assistance Program Policy Services Unit TANF-FSTA mailbox.

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CHAPTER 1

Overview

1000 Ohio's Prevention, Retention and Contingency (PRC) Program

The Prevention, Retention and Contingency (PRC) program is a critical tool for Ohio counties to provide benefits and services needed to overcome immediate barriers to help families become and stay self-supporting. The PRC program provides for nonrecurring, short-term, crisis-oriented benefits and ongoing services that are directly related to one of the four purposes of the Temporary Assistance for Needy Families (TANF) program. The services and benefits provided under the PRC program fall into three categories:

Prevention services: designed to divert families from ongoing cash assistance by providing short term non-assistance.

Retention services: provided to assist an employed member of the family in maintaining employment.

Contingency services: provided to meet an emergent need which, if not met, threatens the safety, health or well-being of one or more family members.

The county agency provides these benefits and services in accordance with their statement of policies for their PRC program (i.e., PRC Plan). This statement of policies governs the county PRC program as further delineated in Section 2000 of this guide. The county agency is held responsible for funds expended or claimed within the PRC program. State law establishing the PRC program can be found in Chapter 5108 Revised Code (ORC).

1010 Laying the Groundwork for PRC: The Federal TANF Program

The federal TANF program is established under 42 U.S.C. 601 *et seq.* and 45 C.F.R. Parts 260-265. The PRC program is funded by the federal Title IV-A TANF block grant. Ohio Department of Job and Family Services (ODJFS) administers the program in accordance with Title IV-A of the Social Security Act, 42 USC 601, Ohio's Title IV-A State Plan and state law.

The PRC program was created by the Ohio General Assembly and is governed by Section 5108 Revised Code, Ohio Administrative Code and federal law and regulations. One of the main sources of funding is the federal Title IV-A TANF block grant issued to states to tailor their welfare programs to meet individual states' needs. As a result, there are federal laws and regulations governing TANF that relate to the PRC program.

A. Four Purposes of the TANF Program

The TANF program encompasses a wide variety of services, benefits, programs, and employment and training activities that enable individuals to find employment, succeed at work and improve their economic circumstances. The TANF program also funds services to prevent out-of-wedlock pregnancies and support the formation and stability of two-parent families.

TANF funds must be used “in any manner reasonably calculated to accomplish” any of the four purposes of the TANF program. 64 Fed. Reg. 17826 (April 12, 1999). The four purposes of TANF can be found in federal law, 42 U.S.C. 601 and 45 CFR 260.20. This means that a program or service provided through the PRC program must accomplish one of the four purposes of TANF.

Below is an excerpt from the Department of Health and Human Services (HHS) guide, Helping Families Achieve Self-Sufficiency, explaining the four purposes of TANF [found at 42 U.S.C. 601(a)].

Purpose 1: “To provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives”

This purpose covers only needy families so children may live with their parents or other relatives. It does not cover children living with non-relatives.¹ A needy family is one that meets the income and/or resource standards established by the state in its TANF plan. A state may establish a variety of income and resource standards for “assistance” and other services and benefits.

This purpose is not limited to benefits that are within the regulatory definition of “assistance.” A state may provide other services in support of this purpose. For example, funding home repairs for needy families would be consistent with the purpose.

Purpose 2: “To end the dependence of needy parents on government benefits by promoting job preparation, work and marriage”

A state could help any needy parent, including a non-custodial parent or a working parent, by providing employment, job preparation or training services. Examples of potential services include job or career advancement activities, marriage counseling, refundable earned income tax credits and employment services designed to increase the non-

¹ HHS has issued clarification which indicates that if state law provides that legal guardians or other individuals stand *in loco parentis*, then the state could provide benefits and services under this purpose. Under Ohio law, legal guardians and legal custodians stand *in loco parentis*. HHS TANF Program Policy Questions and Answers, <http://www.acfhhs.gov/programs/ofa/polquest/index.htm>.

custodial parent's ability to pay child support. Activities that promote any one of the objectives – job preparation, work and marriage - would be consistent with this purpose.

Purpose 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”

This purpose is not limited to needy families or individuals. However, the state must establish objective criteria for the delivery of services to the non-needy.

Potential activities that would be reasonably calculated to accomplish this purpose include family planning, clinical and follow-up services, abstinence programs, visiting nurse services and programs and services for youth such as counseling, teen pregnancy prevention campaigns and after-school programs that provide supervision when school is not in session.

Purpose 4: “To encourage the formation and maintenance of two-parent families”

A significant share of TANF families consists of unmarried mothers with low skills who live with their children apart from low-skilled, underemployed fathers. Many of these fathers are involved in the lives of their children and provide some financial support, but would like to do much more. Historically, the fathers have found limited employment opportunities, and welfare rules have worked to discourage family formation and fuller involvement of these fathers in the lives of their children.

Some activities that are reasonably calculated to accomplish this purpose might include parenting skills training, premarital and marriage counseling, and mediation services; activities to promote parental access and supervision; job placement and training services for non-custodial parents; initiatives to promote responsible fatherhood and increase the capacity of fathers to provide emotional and financial support for their children; and crisis or intervention services.

B. Purposes Previously Authorized Under a State's Title IV-A State Plan as of August 21, 1996

PRC may also be used for purposes previously authorized under Ohio's Aid to Families with Dependent Children (AFDC) state plan even if they do not meet a purpose of TANF. The use of funds in this manner is more restrictive than when funds are used for the four TANF purposes discussed above.

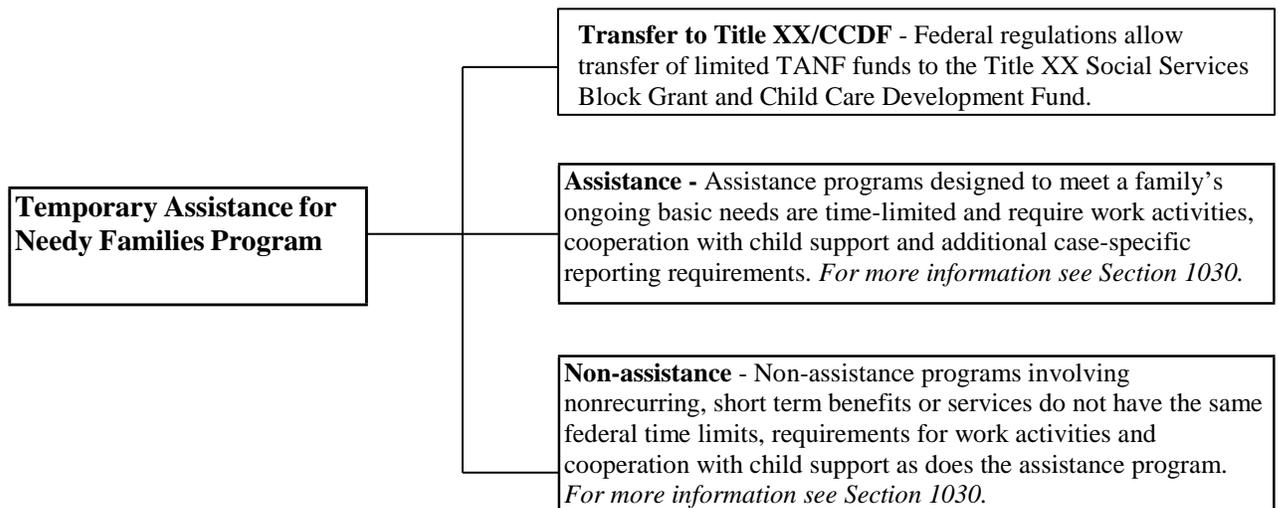
In expending funds for this purpose, **counties must use the same eligibility criteria contained in Ohio’s AFDC state plan as of August 21, 1996. Prior law also dictates the scope and duration of the services.** The prior law requirements are outlined in Appendix A of this guide. Expenditures for previously authorized services must be made from federal TANF funds and as such, must be tracked and identified separately for federal fiscal reporting purposes.

An advantage of using this option is that the prohibition on providing medical services does not apply to the use of funds for this purpose. Since Ohio previously covered certain limited medical services under Ohio’s 1996 AFDC state plan, we can continue to provide these types of services.

1020 How is the TANF Program Administered?

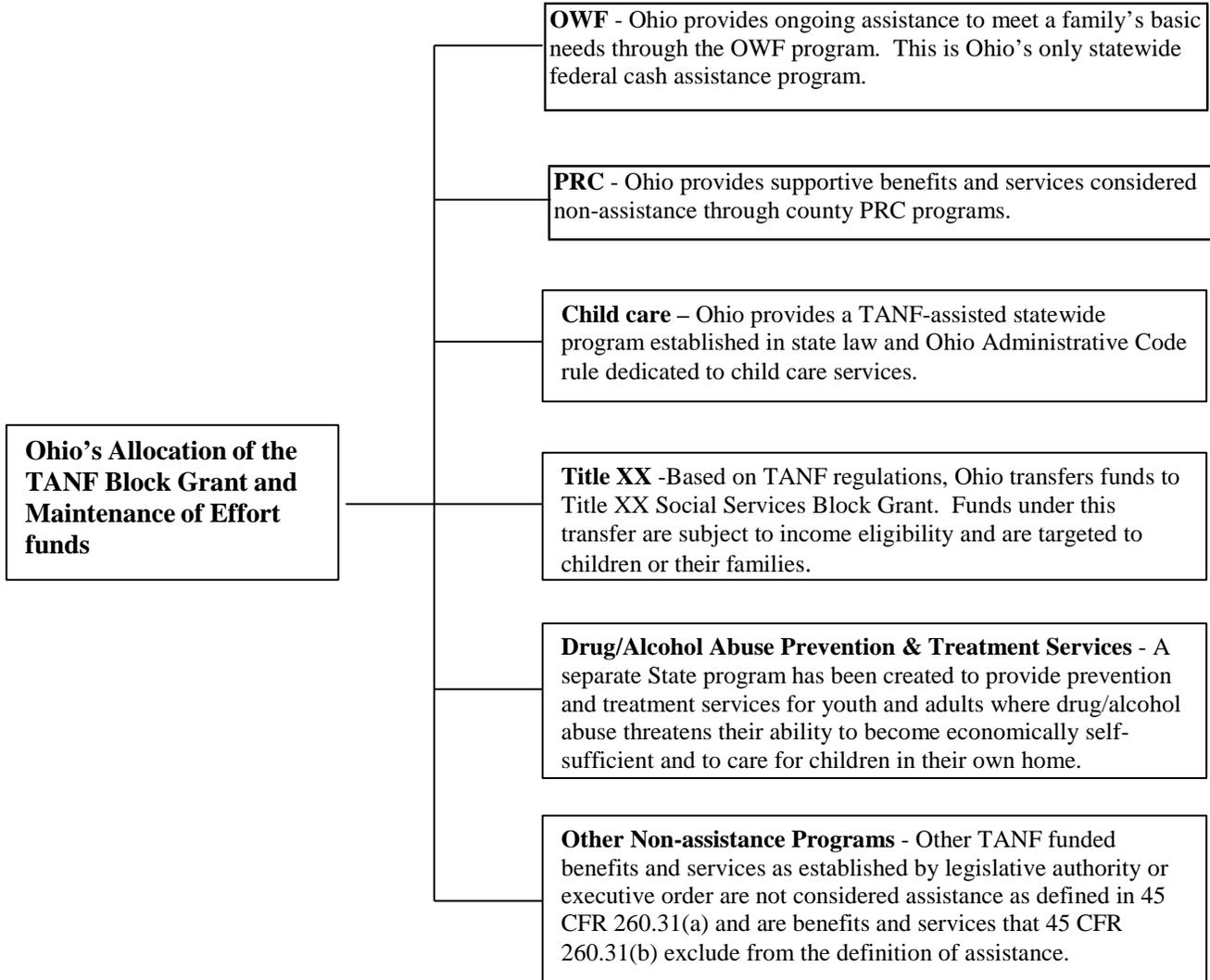
Below is a breakdown of the Federal TANF program and how Ohio implements the TANF program.

THE FEDERAL TANF PROGRAM



HOW OHIO IMPLEMENTS THE TANF PROGRAM

(Ohio is state supervised and county administered)



1030 TANF “Assistance” and “Non-Assistance”

As section 1020 of the guide shows federal law differentiates between “assistance” and “non-assistance” programs under TANF. This is an important distinction because if a family receives TANF “assistance,” there are many additional federal requirements that apply to the family which include:

- f Federal time limits on how long the family can receive assistance;
- f Work requirements;
- f Cooperation with child support; and
- f Additional detailed data reporting to the federal government.

45 Code of Federal Regulations (C.F.R.) §260.31 defines TANF “assistance” and “non-assistance” as:

"(a)(1) The term 'assistance' includes cash, payments, vouchers, and other forms of benefits designed to meet a family's ongoing basic needs (*i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses*).

(2) It includes such benefits even when they are:

- (i) Provided in the form of payments by a TANF agency, or other agency on its behalf, to individual recipients; and
- (ii) Conditioned on participation in work experience or community service (or any other work activity under Sec. 261.30 of this chapter).

(3) Except where excluded under paragraph (b) of this section, it also includes supportive services such as transportation and child care provided to families who are not employed.

(b) Assistance *excludes* (thus making it “non-assistance”):

(1) Non-recurrent, short-term benefits that:

- (i) Are designed to deal with a specific crisis situation or episode of need;
- (ii) Are not intended to meet recurrent or ongoing needs; and
- (iii) Will not extend beyond four months.

(2) Work subsidies (*i.e.* payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);

(3) Supportive services such as child care and transportation provided to families who are employed;

(4) Refundable earned income tax credits;

(5) Contributions to, and distributions from, Individual Development Accounts (IDAs);

(6) 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, and

(7) Transportation benefits provided under a Job Access or Reverse Commute

Note: HHS stated in the preamble to the federal regulations that they did not want a state to bundle several months’ worth of assistance into a single assistance payment in order to avoid TANF requirements for itself or the family. In addition, they state they did not see it as appropriate for States merely to condense the time period over which they pay

assistance to needy families to that they can categorize the benefits as “non-assistance” and avoid TANF requirements.

As a result, a state cannot design a program that provides a benefit that lasts four months and fits within the definition of “non-assistance” unless the benefit is meant to deal with a short term crisis situation or episode of need and is not intended to extend beyond four months. 64 Fed. Reg. 17761 (April 12, 1999).

1040 Federal Limitations and Requirements

When planning to provide new and expanded services, supports and activities under the PRC non-assistance program, a county agency should be aware of federal statutory requirements, restrictions and cost principles applicable to the TANF program.

A. Federal TANF Statutory Requirements

1. Counties are to reference the Catalog of Federal Domestic Assistance (CFDA) number in all of its TANF sub-grants and must ensure compliance with the Fiscal Administrative Procedures Manual and Section 400(d) of the Office of Management and Budget Circular Number A-133. The CFDA identifies the Federal TANF grant by the number 93.558. The CFDA provides a detailed description of the TANF grant’s requirements and restrictions.
2. State and local TANF programs must be consistent with federal law, including meeting one of the four purposes of TANF, and applicable TANF regulations.
3. Any state and local TANF program, including “non-assistance” programs, must be set forth in a state plan which delineates:
 - f Objective criteria for delivery of services and benefits;
 - f How eligibility will be determined; and
 - f Procedures for the fair and equitable treatment of those who apply for the program.
4. Federal TANF program funds cannot be used for medical services, except for pre-pregnancy family planning services. Medical services include inpatient and outpatient medical services as well as mental health and substance abuse treatment. The only exception is that the county agency may provide certain medical services in accordance with Ohio’s August 21, 1996, Title IV-A State Plan. For additional information on Previously Authorized Medical Services, reference Section 1010 and Appendix A of this guide.

5. Federal funds for the TANF program may not be used to supplant spending in the areas of child support enforcement, foster care, or adoption assistance under Titles IV-D and IV-E of the Social Security Act.
6. A state or county may not use federal TANF program funds to satisfy a cost-sharing or matching requirement of another federal program unless specifically authorized by 2 CFR 225, Appendix A.
 - However, to encourage expenditures on transportation services that could help low-income families' access employment, section 3037 of the Transportation Equity Act for the 21st Century (Pub. L. 105-178) specifically allows states/counties to use federal funds (up to a statutory limit) to help meet cost-sharing requirements under the Job Access program.
 - Any costs charged to the TANF program must be necessary, reasonable, and allocable to the program. 45 CFR 92.42 requires states and counties to keep records to document claims, including adequate records on program eligibility. Refer to ODJFS Legal Brief 02-01, "PRC and Other Non-assistance Eligibility Determinations," available at <http://innerweb/Ols/briefs/index.shtml> for applicability to county PRC programs.
7. Federal TANF program funds may not be used to construct or purchase buildings or facilities, or to purchase real estate. This restriction is based on the general rule, in a long line of Comptroller General decisions, that in the absence of specific legislative authority, appropriated funds may not be used for the permanent improvement of property, including construction and purchase. For example, see the decision at 42 Comp. Gen. 480 (1960).
8. States and counties must comply with federal TANF reporting requirements. In Ohio, this is accomplished, in part, by posting each county's PRC plan on the Internet and by use of the TANF Web Reporting Tool (WRT) and Client Registry Information System-Enhanced (CRIS-E) tracking.
9. A state or county may not use TANF funds for general expenses required to carry out other responsibilities of the county (e.g., building roads providing public education, etc.).

B. General Procurement and Grants Management Requirements for Federal Funds

TANF funds are federal funds. As a result, federal procurement and grants management regulations apply to TANF funds. Requirements for counties are set forth in the ODJFS Fiscal Administrative Procedure Manual which can be found on the ODJFS website. Counties are encouraged to work with the ODJFS Office of Fiscal and Monitoring

Services to determine how to account for the program and how to apply federal procurement and grants management requirements.

C. Civil Rights Laws

The following civil rights laws apply to states, counties and other public and private entities that receive federal financial assistance and provide funds, training, and other services and benefits under the TANF program. The laws require that federally assisted programs be administered in a manner that does not discriminate or have the effect of discriminating, on the basis of race, color, national origin, disability, sex, age, religion or political belief. Additional information on the civil rights laws can be found at <http://www.hhs.gov/ocr/civilrights/>

1. **Section 504 of the Rehabilitation Act of 1973**, as amended, prohibits discrimination on the basis of disability by recipients of Federal financial assistance. 29 U.S.C. 794, Section 504.
2. **Title II of the Americans with Disabilities Act of 1990 (ADA)** provides that no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs or activities of a public entity, or be subjected to discrimination by any entity. 42 U.S.C. 1201.1 et seq.
3. **Title VI of the Civil Rights Act of 1964**, as amended, prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives federal funds or other Federal financial assistance. Programs that receive Federal funds cannot distinguish among individuals on the basis of race, color or national origin, either directly or indirectly, in the types, quantity, quality or timeliness of program services, aids or benefits that they provide or the manner in which they provide them. 42 U.S.C. 2000d et seq.
4. **The Age Discrimination Act of 1975** prohibits discrimination on the basis of age in programs and activities receiving federal financial assistance. A provider generally may not exclude, deny, or provide different or lesser services to applicants or beneficiaries, on the basis of age. 42 U.S.C 5101 et seq.

D. Employment Laws

Federal employment laws such as the Fair Labor Standards Act (FLSA), the Occupational Safety and Health Act (OSHA), Unemployment Insurance (UI), and anti-discrimination laws apply to welfare recipients as they apply to other workers. For more information, see ODJFS Office of Legal Services Legal Brief 98-01, "Application of the Fair Labor Standards Act to TANF Work Activities," at: <http://innerweb/Ols/briefs/BRIEF9801.PDF> and the Department of Labor's guidance, found at: <http://www.dol.gov/dol/topic/training/welfare.htm>

1050 TANF Penalty Provisions

Federal regulations provide for penalties in situations where it is determined that a violation has occurred with the use of federal TANF program funds. State law provides for penalties for failure to comply with state or federal law, which includes the use of TANF program funds.

Violations range from a failure to submit required reports to intentionally misusing federal TANF program funds. Penalties, as set forth in 45 CFR 263 through 45 CFR 265, could be applied as a result of these violations. The penalties range from repayment of the amount of the misused funds to a reduction in a state's TANF block grant for each quarter that a report is not filed.

Section 5101.24 Revised Code sets forth the violations of federal or state requirements which range from the failure to comply with a corrective action plan to a failure to comply with state, federal law or a Governor's Executive Order. Penalties that could be applied for violations include the reimbursement to ODJFS of the cost of the federal penalty, audit finding or quality control finding to sharing a federal sanction with ODJFS.

Appendix B contains a chart with more information on potential federal TANF penalties.

CHAPTER 2

The County PRC Plan

This section provides details regarding the Ohio PRC program. It addresses the fundamentals of a good county PRC plan, including utilizing the community planning process and understanding county responsibilities.

2000 Community Plan Framework for the County PRC Program

In creating the PRC program, the General Assembly delegated significant flexibility to Ohio counties to tailor PRC programs to local needs, preferences and opportunities. This approach allows counties to develop strategies specific to their county needs, resources and population to prevent dependency on cash assistance and promote employment. The opportunity for local decision-making necessitates developing a process for identifying local needs, coordinating with other local service providers, setting program goals, measuring success and adjusting service priorities and efforts. To assist in this process, section 329.06 Revised Code requires counties to establish a local County Family Services Planning Committee designed to provide advice on these issues to each Board of County Commissioners. The community planning process should create a context and framework for the specific provisions necessary to complete a county PRC plan. The development of a successful county plan should:

- f involve the local stakeholders,
- f identify local needs and opportunities,
- f determine desired outcomes,
- f identify available services,
- f assess service gaps,
- f determine service priorities and strategies,
- f periodically review status of strategies and services,
- f measure the effect of services and strategies on outcomes, and
- f periodically adjust and change strategies and priorities.

As each county explores the requirements of the PRC plan, it is important that these steps be guided by an overall strategy to serve low income families in the context of resources, opportunities and needs of each county.

2010 PRC Plan Requirement

As required by section 5108.04 Revised Code, no later than October 1, 2003, each county agency was required to adopt an initial written statement of policies (PRC plan) governing the PRC program for the county. The county PRC plan governs the PRC program for each county to deliver PRC benefits and services.

The county PRC plan may be amended at any time if the county determines that specific benefits and services need adopted, revised, or eliminated to best suit the county needs. However, the plan must be renewed at least biennially (i.e., October 1, 2013, October 1, 2015 October 1, 2017, etc.).

2020 Establishing a PRC Plan

As a county agency develops their PRC plan, they must consider and document what purpose of the TANF program the benefits and services are intended to serve. Including the purpose of TANF for each PRC benefit and services in the county PRC plan along with an explanation of how the programs are designed to meet the stated purposes.

Section 5108.05 Revised Code sets forth the requirements for establishing a PRC plan:

“In adopting a statement of policies under section 5108.04 of the Revised Code for the county’s prevention, retention, and contingency program, each county department of job and family services shall do all of the following:

- (A) Establish or specify all of the following:
 - (1) Benefits and services to be provided under the program that are allowable uses of federal Title 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. 260.31(b) excludes from the definition of assistance;
 - (2) Restrictions on the amount, duration and frequency of the benefits and services;
 - (3) Eligibility requirements for the benefits and services;
 - (4) Fair and equitable procedures for both of the following:
 - (a) The certification of eligibility for the benefits and services that do not have a financial need eligibility requirement;

- (b) The determination and verification of eligibility for the benefits and services that have a financial need eligibility requirement.
- (5) Objective criteria for the delivery of the benefits and services;
- (6) Administrative requirements;
- (7) Other matters the county department determines are necessary.
- (B) Provide for the statement of policies to be consistent with all of the following:
 - (1) The plan of cooperation the board of county commissioners develops under section 307.983 [307.98.3] of the Revised Code;
 - (2) The review and analysis of the county family services committee conducted in accordance with division (B)(2) of section 329.06 of the Revised Code;
 - (3) Title IV-A, federal regulations, state law, the Title IV-A state plan submitted to the United States secretary of health and human services under section 5101.80 of the Revised Code, and amendments to the plan.
- (C) Either provide the public and local government entities at least thirty days to submit comments on, or have the county family services planning committee review, the statement of policies, including the design of the county’s prevention, retention, and contingency program, before the county director signs and dates the statement of policies.”

Section 5108.05(A)(3) of the Revised Code, as identified above, notes eligibility requirements for benefits and services must be established. As the need to perform eligibility testing is dependent upon which TANF purpose a benefit or service is designed to meet, the county should clearly link the benefits and services included in its plan to a TANF purpose. TANF purpose 1 and 2 require a means-tested individual eligibility determinations.

2030 Biennial Review of the PRC Plan

For the biennial renewal, the county agency must complete the following steps:

1. Review eligibility criteria, services and benefits in the current PRC plan to determine if changes are necessary.
2. Public Comment: The county agency must either:
 - Provide the public and local government entities at least thirty days to submit comments on the PRC plan, or
 - Have the County Family Services Planning Committee review it.
3. Complete any revisions based upon comments from the County Family Services Planning Committee or through 30-day comment period.
4. The county agency Director must sign and date the PRC plan. The effective date of the biennial renewal shall not be earlier than the date of the county agency Director's signature.
5. The Board of County Commissioners must certify that the county agency has complied with Chapter 5108 Revised Code in adopting the PRC plan. (A sample County Commissioner certification can be found in Appendix C)
6. The county agency must send a complete copy of the PRC plan, including the amended changes electronically to the Ohio Department of Job and Family Services (ODJFS) at Program-Policy@jfs.ohio.gov no later than ten calendar days after the plan's effective date. In the subject line of the e-mail, please indicate:
 - The county name,
 - Effective date of the plan, and
 - That this plan is a biennial.
7. The county agency must fax a copy of the county agency Director's signature page (unless transmitted electronically) and the County Commissioners' Certification to the Cash Assistance Policy Section to (614) 466-1767.

2040 Biennial Renewal Checklist

The checklist below is a tool county agencies should utilize to ensure that all of the steps for a biennial renewal are completed.

Date Completed	Task
	Review eligibility criteria, services and benefits in current PRC plan to determine if changes are necessary.
	Provide for 30-day comment period or submit to County Family Services Planning Committee.
	Complete any revisions based upon comments from the County Family Services Planning Committee or through 30-day comment period.
	Secure county agency Director signature.
	Secure County Commissioner certification that the PRC plan has complied with Chapter 5108 Revised Code.
	Submit the complete PRC plan electronically no later than 10 calendar days from the effective date but no later than the deadline date of each biennial period to Program-Policy@jfs.ohio.gov
	Fax county agency Director’s signature page (unless electronically sent) and County Commissioner certification to (614) 466-1767.

2050 Amendments to the PRC Plan

A county agency may not suspend its PRC plan entirely; however, it may amend its PRC plan as needed. To amend the plan, the county agency must complete the following steps:

1. Review eligibility criteria, services and benefits in current PRC plan to determine if changes are necessary.
2. The county agency Director must sign and date the PRC plan. The effective date of the amendment shall not be earlier than the date of the county agency Director’s signature.
3. Under section 5108.07 Revised Code, certification of amendments by the Board of County Commissioners is not required unless the Board considers the change to the PRC plan to be significant. We recommend that the county agency and

the Board of County Commissioners come to an understanding of what amendments are considered “significant” and therefore require revised certification by the Board.

4. The county agency must send a complete copy of the PRC plan, including amended changes, and a complete description of the current county plan electronically to the ODJFS at Program-Policy@jfs.ohio.gov no later than ten calendar days after the plan’s effective date. In the subject line of the e-mail, please indicate the:
 - a. County name,
 - b. Effective date of the plan, and
 - c. That this plan is an amendment.
5. The county agency must fax a copy of the county agency Director’s signature page (unless transmitted electronically) and the county commissioner certification (if required by the Board of County Commissioners) to the Cash Assistance Policy Section at (614) 466-1767.

2060 PRC Plan Amendment Checklist

The checklist below is a tool county agencies should utilize to ensure that all of the steps for a plan amendment are completed.

Date Completed	Task
	Review eligibility criteria, services and benefits in current PRC plan to determine if changes are necessary.
	Secure county agency Director signature.
	Secure County Commissioner certification that the PRC plan has complied with Chapter 5108 Revised Code ONLY if the Board of County Commissioners requires it due to significant changes to the plan.
	Submit the complete PRC plan electronically no later than 10 calendar days from the effective date to Program-Policy@jfs.ohio.gov A complete copy of the PRC plan, including the amendment, must be submitted.
	Fax county agency signature page (unless electronically sent) and County Commissioner certification (if applicable) to (614) 466-1767.

2070 Summary Biennial and Amendment PRC Plan Procedures

Requirement	Biennial Renewal	Amendment
Submission requirement	Every 2 years.	When a change of the plan is made.
30-day public comment period or review by County Family Services Planning Committee	Required.	Not required.
Effective date	Cannot be earlier than the county agency Director's signature.	Cannot be earlier than the county agency Director's signature.
County Commissioner certification	Required.	Not required, unless the Board of County Commissioners considers the change to the plan significant.
Submission to ODJFS	Complete plan sent electronically to Program-Policy@jfs.ohio.gov no later than 10 calendar days from the effective date but no later than the deadline date of each biennial period.	Complete plan sent electronically to Program-Policy@jfs.ohio.gov within 10 calendar days after the plan's effective date.
Director's signature page	Fax to Cash Assistance Policy @ (614) 466-1767 unless transmitted electronically.	Fax to Cash Assistance Policy @ (614) 466-1767 unless transmitted electronically.
County Commissioner certification (if required)	Required and faxed to Cash Assistance Policy @ (614) 466-1767 unless transmitted electronically.	If required by the Board of County Commissioners, faxed to Cash Assistance Policy @ (614) 466-1767 unless transmitted electronically.
Receipt of PRC plans by ODJFS	The State reviews to determine if the plan is complete and acknowledges receipt to the county. The State neither approves nor disapproves the policies and practices outlined in the plan. A finding that this document is received does not represent the concurrence of the State with any claims by the county.	The State reviews to determine if the plan is complete and acknowledges receipt to the county. The State neither approves nor disapproves the policies and practices outlined in the amendment. A finding that this document is received does not represent the concurrence of the State with any claims by the county.
Posting of PRC plans to the internet	As soon as possible.	As soon as possible.

CHAPTER 3

Application and Eligibility for PRC

In drafting a PRC plan, the county agency must define eligibility components for receiving benefits and services. Some components are mandated by federal and state law; some components are dependent upon which TANF purpose the benefits and services are intended to serve; while others are options that can be employed by the county agency. Outlined below are the criteria for a county agency to consider when drafting its PRC program. Eligibility for a PRC benefit or service shall be determined based upon information the county agency requires, consistent with federal and state law.

3000 Access to PRC Services

PRC benefits and services can only be accessed by one of the following methods:

1. Application
2. Certification; and
3. Non-administrative program operational activities

Each county agency must ensure that the information used to access PRC benefits and/or services is sufficient to establish the eligibility of service. The county agency has the option to maintain the information or allow the third party providing agency to maintain this information. The county agency is responsible to ensure that the verification of PRC benefits and/or services issued by the third party providing agency is readily available when requested to comply with federal and state record retention laws, even if the third party providing agency has ceased to exist.

A. Application

Pursuant to Section 5108.10 Revised Code, an application is required if the benefit or service has a financial need eligibility requirement. Benefits and services provided under TANF purpose 1 (To provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives) and 2 (To end the dependence of needy parents on government benefits by promoting job preparation, work and marriage) require a financial need as part of the eligibility requirements; so there must always be an application to provide benefits or services under TANF purpose 1 or 2.

Benefits and services provided under TANF purpose 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 purpose 4 (To encourage the formation and maintenance of two-parent families) do not require a financial need

eligibility requirement. However, if a county agency chooses to impose a financial need eligibility requirement, an application is required.

The county agency has the flexibility to design its own application or use the State sample application, JFS 03800, “Prevention, Retention, and Contingency Program Application” located in Appendix D of this guide and through JFS Forms Central at <http://www.odjfs.state.oh.us/forms/inter.asp>. The county agency also has the flexibility to develop different applications for different services (i.e., Kinship Care, Family Preservation, Youth Work Opportunity) which contain the elements specific to the service(s) requested.

With each application, the county agency or third party provider must ensure that applicants receive information on their rights during the application process. Recommended language can be found in Appendix F of this guide.

B. Certification

Pursuant to Section 5108.10 of the Revised Code, an application is not required if the benefit or service does not have a financial need eligibility requirement. Instead, eligibility shall be certified in accordance with the county agency’s PRC plan adopted under Section 5108.04 the Revised Code. Only benefits and services that are provided under TANF purposes 3 or 4 may have eligibility certified. If a county agency chooses to impose a financial need eligibility requirement on benefits or services provided under TANF purpose 3 or 4 then an application is required.

Each county agency should assure that the certification information is sufficient to establish the eligibility for of service. The county agency has the option to maintain the certification information or allow the third party providing agency to maintain this information. The county agency is responsible to ensure that the verification of PRC services issued by the third party providing agency is readily available for retrieval when requested for auditing purposes, even if the third party providing agency has ceased to exist.

C. Non-Administrative Program Operational Activities

Certain benefits and services do not require an application or certification for PRC benefits and/or services as they do not provide a direct service linked to an individual family. Such activities could include employer recruitment, outreach, information and referral, websites, billboards and public service announcements which are considered non-administrative program operation costs.

3010 Application Process

Both the county agency and the individual applying have responsibilities and requirements they must meet:

A. County Agency Responsibility

Eligibility for a benefit or service that is based on financial need shall be determined in accordance with the adopted PRC plan and based on an application containing information the county agency requires. The county agency may perform or delegate the application process to a third party providing agency. The county agency is responsible for monitoring the activities of the third party providing agency and maintains responsibility for the actions of its third party providing agencies. Legal Brief 02-01, "PRC and Other Non-assistance Eligibility Determinations" issued by the ODJFS Office of Legal and Acquisition Services, provides guidance on a county agency's responsibility in eligibility determinations and can be found on the ODJFS Innerweb.

Pursuant to Section 5108.10 of the Revised Code, when an application is submitted for benefits or services, the county agency shall follow verification procedures established by its PRC plan to verify the facts surrounding the application and to obtain such other information as may be necessary. We recommend that the county agency provide assistance in obtaining verification when requested by the applicant. Once verifications are received, the county agency shall determine whether the applicant is eligible for the benefits or services and the approximate date when the benefits or services are to begin.

The focus of the PRC program is to provide benefits and services within a specific date of the receipt of a signed application. A ten day standard of promptness is a suggested time frame that is intended to stress the importance of dealing with PRC applications in a timely manner. An emergent need, such as a utility shutoff, may warrant a speedier disposition. In some instances, this time frame will not be met due to unavoidable delays on the part of the applicant or the agency. The county agency's established application process must ensure fair and equitable treatment of applicants and that a client's needs are met in a timely manner.

If a county agency contracts with a provider for issuance of benefits and services under the PRC program, the application responsibilities should be clearly addressed within the contract agreement. All PRC case documentation from the provider should be readily available, even if the provider ceases to exist, for auditing purposes.

Families diverted from OWF through PRC must still have access to information and applications for Medicaid, Food Assistance, Child Care and other programs. Receipt of assistance from these programs does not affect eligibility under the PRC program. Accessing these other programs could further the goals of TANF and help families successfully transition to work. Diverting individuals from programs where they may have eligibility for assistance could also represent a violation of rules in the other program.

B. Applicant Responsibility

An applicant for PRC is responsible for completing all necessary documents, furnishing all available facts and information, and cooperating in the eligibility determination process.

3020 Legislatively Defined Eligibility Components

There are certain eligibility components of a county agency PRC plan which are legislatively required:

A. Social Security Number

Each person applying for PRC must provide the county agency (or third party providing agency) with a social security number, or apply for a social security number. Providing a number is a condition of receipt of TANF and is required under Section 1137(a) of the Social Security Act.

The social security number will be used to check information provided by the individual against information held by other federal, state, and local governments; computer matching systems; and program reviews or audits to ensure eligibility for PRC or, to the extent permitted by federal law, to assist in determining eligibility for any other state, federal, or federally assisted program that provides cash or in-kind assistance or services directly to individuals based on need or for the purpose of protecting children. This information will also be used to monitor compliance with program regulations and for program management.

The social security number may be used when contacting appropriate persons or agencies to determine eligibility and verify information that has been provided for the PRC program; for example, income, financial resources, disability benefits or other similar benefits and programs. Such information may affect household eligibility.

The social security number will be used for a felony warrant match; a match of persons in violation of probation or parole by law enforcement agencies; or for purposes of investigations, prosecutions, and criminal or civil proceedings that are within the scope of law enforcement agencies' official duties.

B. Citizenship

In order to receive PRC benefits and services, at least one member of the PRC assistance group (AG) must be a citizen of the United States or a qualified alien as defined in rule 5101:1-2-30 of the Ohio Administrative Code. See also Section 403(a) of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996.

Section 403(a) of PRWORA states that:

Notwithstanding any other provision of law...an alien who is a qualified alien...and who enters the United States on or after the date of the enactment of this Act is not eligible for any federal means-tested public benefit for a period of five years beginning on the date of the alien's entry into the United States with a status within the meaning of the term 'qualified alien.'

As a general matter, the five-year bar does not affect an individual who entered the United States before enactment.

Under PRWORA, aliens who are not qualified aliens are not eligible for any "federal public benefit" unless the "federal public benefit" falls within a specified exception. HHS has provided its interpretation of "federal public benefit" in 64 FR 41657 (August 4, 1998). TANF benefits are generally considered "federal public benefits" and therefore the five year bar on receipt of federal public benefits would apply to newly-arrived aliens who do not meet one of the statutory exceptions. A use of TANF funds that might not be considered a "federal public benefit" might include pregnancy prevention services that are available to individuals regardless of financial need.

Certain benefits may be provided regardless of immigration status. Sections 401(b) and 411(b) of PRWORA state that States may provide certain non-cash Federal or state and local public benefits to any alien. Such benefits are those necessary for the protection of life and safety and include those specified by the Attorney General in a notice dated August 23, 1996 (AG Order No. 2049-96, 61 FR 45985). In the notice, the Attorney General specified the kinds of non-cash government-funded community programs, services or assistance that are necessary for protection of life or safety and for which all aliens continue to be eligible. None of the benefits or services which are available to all aliens may be conditioned on the individual recipient's income or resources. 64 FR 17819 (April 12, 1999). Services that are provided by shelters for homeless or battered individuals that are available to anyone who needs their help would be an example of services that might be funded in part under the TANF program and could be provided to anyone regardless of immigration status.

C. Residence

The U.S. Supreme Court, in Saenz v. Roe, 526 U.S. 489 (1999), has held that the length of time a person has lived in a place cannot be the basis to deny government assistance benefits. Therefore, durational residency requirements are discouraged in county PRC programs.

D. Fraudulent Assistance

Pursuant to section 5101.83 Revised Code and rule 5101:1-23-75 of the Ohio Administrative Code, 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. The county agency needs to set up a procedure to ensure that this requirement has been met.

E. Voter Registration

The county agency, in accordance with Section 329.051 Revised Code, must make a voter registration application available to persons applying for or participating in the PRC program. This section applies to both county agencies and those entities with whom the county agency contracts. Third party providing agencies can provide the completed voter registration forms to the county agency who in turn should provide them to the Board of Elections.

F. Notice and State Hearing Requirement

PRC notices must be in compliance with Chapter 5101:6 of the Ohio Administrative Code. Rules 5101:6-2-02 and 5101:6-2-03 of the Ohio Administrative Code set forth the requirements for issuing notice when an application for public assistance benefits, including benefits or services under the PRC program, is approved or denied.

County agencies may modify the format, but not the content, of state hearing notices mandated in Chapters 5101:6-1 to 5101:6-9 of the Administrative Code to accommodate computer generation of the notice. All such modifications must be prior approved by the Bureau of State Hearings.

At the time of application, individuals must be informed in writing of their right to request a state hearing. This can be done by providing a copy of the JFS 04059, "Explanation of State Hearing Procedures." The applicant must have the opportunity to be heard in a state hearing or an administrative appeal. Pursuant to Section 5108.09 Revised Code, PRC hearing decisions are based upon the county PRC plan in effect at the time of the adverse decision, and the county agency must provide a copy of the PRC plan and all amendments to the hearing officer.

A model PRC approval notice has been developed from the JFS 04074 as approved by the Bureau of State Hearings. The form is located in Appendix G. Counties are encouraged to utilize this model form when a PRC assistance group is authorized to receive a PRC benefit or service. The form also provides a notice to the assistance group of potential categorical eligibility for food assistance as an assistance group with any member authorized to receive or that is receiving benefits or services under the PRC program is considered categorically eligible for the Food Assistance Program.

The county agency must also establish a process in which an applicant found ineligible or adversely affected by a county agency or third party providing agency determination for PRC benefits is provided with notice in accordance with Chapter 5101:6 of the Ohio Administrative Code. The county agency may use the JFS 07334, "Notice of Denial of Your Application for Assistance" or their own county-created denial form when a PRC assistance group is found ineligible for PRC benefits or services.

G. Charitable Choice and Faith-Based Initiatives

Charitable Choice provisions apply when states use faith-based organizations in providing TANF benefits and services to eligible families. Federal regulations (45 CFR 260.34) require that assistance groups have the right to request an alternative provider, and that the assistance groups be notified of this right. Legal Brief 04-01, "Charitable Choice and Faith-Based Initiatives," issued by the ODJFS Office of Legal Services, provides information on the federal requirements. Office of Family Stability Letter #22, "Charitable Choice and Faith-Based Initiatives" provides further guidance to county agency directors about the application of the charitable choice requirement. Both letters can be found on the ODJFS Innerweb.

An assistance group that objects to a faith-based provider must be provided with an alternative provider of services within a reasonable period of time. The alternative provider must be reasonably accessible and be able to provide comparable services.

An assistance group must receive notice of their right to request an alternative provider. The notice must clearly explain the right to be referred to an alternative provider and services that reasonably meet timeliness, capacity, accessibility and equivalency requirements. Notification of these Charitable Choice provisions can be added to self-sufficiency contracts or provided in a notice to PRC applicants and recipients. A sample notice concerning Charitable Choice is located in Appendix H.

3030 Locally Defined County Agency Eligibility Components

There are certain eligibility components of a county agency PRC plan which must be locally defined:

A. Assistance Group Composition

In Ohio all families are served through defined assistance groups. Assistance groups participating in the OWF program may be defined differently from those obtaining services under the PRC program. Based upon Title IV-A federal regulations and state law, a TANF eligible family must, at a minimum, consist of a:

- f Minor child who resides with a parent, specified relative, legal guardian or legal custodian (a child may be temporarily absent from the home provided certain requirements are met);
- f Pregnant individual with no other children; or
- f Non-custodial parent who lives in the state, but does not reside with his/her minor child(ren).

1. PRC Benefits and Services

A county agency may create one definition of a PRC assistance group for all benefits and services included in the county PRC plan. However, this approach limits county flexibility and service delivery. A more flexible approach is to identify eligible assistance groups and limitations for each type of service the county intends to provide. The following list includes considerations for a county agency in establishing eligible assistance groups:

- f An eligible assistance group may consist of a minor child residing with a parent, specified relative, legal guardian or legal custodian and other members of the household (who may or may not be related to the minor child) who may significantly enhance the family's ability to achieve economic self-sufficiency.
- f A county agency may provide PRC services to more than one PRC assistance group even when both PRC assistance groups contain the same child.

The dollar value provided to one PRC assistance group does not necessarily have to count against the dollar value provided to another PRC assistance group containing the same child.

- f A county agency may create several categories of PRC assistance groups to receive different benefits and services. For example, a county agency may wish to identify the types of services and limitations for a non-custodial parent PRC assistance group that is different from those established for the kinship care PRC assistance group.
- f A county agency could identify a different set of services and limitations for an employed PRC assistance group.

☐ A county agency may also provide different benefits and services designed to meet the different needs of the same assistance group. For example, a county agency may:

- Create financial caps or service limitations for services or short term financial help to a defined assistance group;
- Limit or cap some services/benefits and not others; or,
- Set monthly, quarterly or yearly limitations for providing services and financial caps.

An assistance group member may be “temporarily absent” yet the individual and his/her family may still qualify for PRC benefits and services. “Temporary absence” has the same meaning for the PRC program as it does for OWF as set forth under Section 5107.10 Revised Code and rule 5101:1-3-04 of the Ohio Administrative Code. Pursuant to rule 5101:1-3-04, the absence of a member of the AG is temporary if :

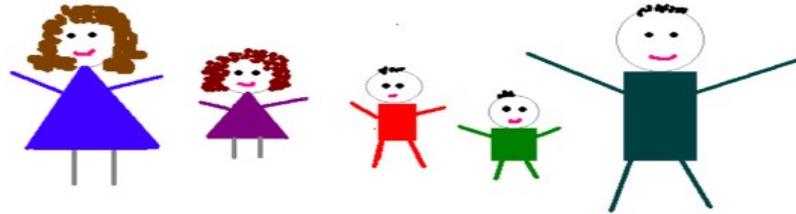
- f The assistance group member has been absent for no longer than 45 consecutive days;
- f Location of the absent individual is known;
- f There is a definite plan for the return of the absent individual to the home, and
- f The absent individual shared the home with the assistance group prior to the onset of the absence.

Rule 5101:1-3-04 also sets forth exceptions to the requirement that the assistance group member be absent for no longer than 45 consecutive days. Most relevant to PRC is the situation where a child is removed from the home by the public children services agency (PCSA) if the agency indicates that there is a reunification plan to return the child to the home within six months.

2. Assistance Group Scenarios

The following examples are designed to convey various scenarios of assistance groups, but do not exhaust all the potential arrangements:

FIGURE 1 -- Mother and three children in an OWF AG. One child and non-custodial father in PRC AG.



OWF AG: MOM AND THREE CHILDREN

PRC AG: DAD AND ONE CHILD

FIGURE 2 -- Children in temporary custody and living with grandmother while their mother remains in open OWF assistance group.



PRC AG: GRANDMOTHER AND CHILDREN

OWF AG: CHILDREN ONLY

OWF AG: HELD OPEN WHILE CHILDREN ARE IN PLACEMENT

FIGURE 3 -- Grandmother with three children in her OWF Assistance Group. Mother and three children in PRC Assistance Group. Non-custodial father and one child in PRC Assistance Group.



FIGURE 4 -- Custodial father with two children in PRC Assistance Group. Non-custodial mother in PRC Assistance Group.



FIGURE 5 -- The children live at home with mother. Grandmother lives in the home.



B. Economic Need

Eligibility for PRC benefits and services intended to meet purposes 1 and 2 of TANF is dependent upon the assistance group's demonstration and verification of need (income and/or resource standard). In order for eligibility to be determined, the income of the assistance group must be compared to the income need standard established by the county agency in the county PRC plan. The assistance group's income must be equal to or less than the standard.

Under purposes 3 and 4 of TANF, families and individuals may receive PRC benefits and services without regard to need. For programs under purposes 3 and 4 of TANF, a county agency may establish a standard of need to target certain populations, which should be documented in its PRC plan.

The PRWORA did not define a need standard or income cap to be used when determining eligibility for TANF non-assistance benefits and services. The preamble to the federal TANF regulations, 64 Fed. Reg. 17826 (April 12, 1999) states the following:

Comment: A few commenters, including two advocacy groups, recommended that we establish a ceiling on the income standards used by a State to ensure that basic maintenance of effort expenditures are appropriately targeted to help families most in need.

Response: The proposed rules were silent on this issue. However, we do not think it is appropriate for us to establish a ceiling in the final rule. TANF leaves this responsibility to the States. We hope that States will establish reasonable income standards to ensure that expenditures are targeted to families most in need.

While Congress did not explicitly provide for an income cap under TANF, we believe that Congress was very interested in the ways States are targeting their resources to help families most in need find work and move toward self-sufficiency. For example, section 404(d)(3)(B) of the Act requires that TANF funds transferred to title XX programs must be used only for programs and services to children or their families whose income is less than 200 percent of the income official poverty line (as defined by the Office of Management and Budget) applicable to a family of the size involved. Thus, we re-emphasize our hope that States will target their resources in ways that help needy families and support the goals of the program.

The preamble's explicit reference to a need standard of 200% of the federal poverty level for Title XX transfers strongly supports an interpretation of the federal law that Congress considered a reasonable definition of "needy" to be at or below 200% of the federal poverty level. As a result, ODJFS has recommended that county agencies adopt a need standard not to exceed 200% of the federal poverty level (FPL) in most situations.

There may be instances where a standard of need that exceeds 200% of the FPL might be appropriate, but such a determination should be accompanied by a logical explanation or justification explaining why the selected standard of need is appropriate and reasonable in those circumstances.

Keeping in mind the implications of the above preamble language and federal regulations, a county agency still has many options in defining economic need. Means tests such as income level, percentage of poverty, relationship to the state's median income or participation in other means tested programs such as Food Assistance or Medicaid can demonstrate economic need. The county agency may also use different economic need tests for different types of benefits and services. However, simply needing a service such as utility shut-off prevention, transportation or training does not constitute a definition of economic need. Each county agency has a responsibility to ensure that their expenditures are targeted to families most in need and reflect the intent of federal goals for the program.

Examples of varying percentages of economic need standards for specific benefits and services are reflected in the ODJFS Federal Poverty Guideline (FPG) Measure chart. The formula that ODJFS uses for determining the monthly amount is:

$Annual\ FPG \div 12\ months\ (rounded\ up) = 100\% \text{ monthly } FPG$
 $100\% \text{ annual } FPG \times \% \text{ FPG } (rounded\ up) = \text{Monthly amount/Assistance Group size.}$

The chart can be accessed under the Cash Assistance Manual located at the ODJFS web site. (See “CAM Desk Aids” Section.)

C. Countable Income

A county agency can decide what types of income it will consider when determining economic need. A county agency has the flexibility to specify the income limits it will use when determining eligibility for its PRC program. The total gross income, both earned and unearned, of all members of a PRC AG may be counted when determining PRC eligibility. The county agency may opt to include or exclude all income which is normally exempt or disregarded when determining eligibility for OWF or Disability Financial Assistance (DFA), Supplemental Security Income (SSI) and/or Food Assistance.

There are some income and benefits which are federally required to be excluded from all assistance programs when determining income eligibility. Rule 5101:1-24-20 of the Administrative Code addresses the issue of excluded income.

1. Earned Income

The following are examples of earned income which a county agency may count at its discretion. This is not intended to be an all-inclusive list:

- 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

2. Unearned Income

The following are examples of unearned income which a county may opt to consider. This is not intended to be an all-inclusive list:

- Retirement, Survivors, Disability Insurance (RSDI) Benefits
- Alimony and child support
- Veteran Administration benefits
- Workers’ Compensation benefits
- Lump-sum payments
- Unemployment benefits
- Pension and retirement benefits
- Strike benefits
- Investment income
- Rental income

D. Resource Limits

A county agency may choose to specify a resource limit for purposes of determining eligibility. The county may want to specify what type of resources they will include as available to meet the need of an assistance group. The county may set resource limits for different services. If a county agency chooses to specify a resource limit, they must provide language within their PRC plan which stipulates the resource requirement(s).

E. Verification

For cases in which verification cannot be accurately obtained, implementation of practices that are reasonable and prudent should occur. A signed JFS 07341, "Applicant/Recipient Authorization for Release of Information" should be obtained from the applicant for an inquiry. Once the release is received, the county agency shall assist the assistance group in collecting the verification.

In accordance with Section 5108.05 of the Revised Code, each county agency must have 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.

If a county agency chooses to accept self-declaration of income from an applicant applying for PRC benefits or services, it is the responsibility of the county agency to ensure that the client statement is documented in the case record. Therefore, a county agency that chooses to accept self-declarations must state this policy within its PRC plan and document such case activity.

F. Case Record Retention

There is a discussion in the preamble to the final TANF regulations (64 FR 17827, April 12, 1999) which states:

...we would note that 45 CFR 92.42 requires states to keep records to document claims and that states should, therefore, have and keep adequate records on eligibility.... States have an inherent interest in ensuring the integrity of their expenditures. Should a state learn of any material deficiency in its method for determining eligibility, we anticipate that the state would rectify it immediately, so that funds for services are properly benefiting members of eligible families.

The application and any other information gathered during the eligibility determination process should be kept in the ongoing OWF, Medicaid, and/or Food Assistance assistance group record. If the assistance group is not in receipt of ongoing OWF, Medicaid, and/or Food Assistance, a separate assistance group folder should be maintained for the PRC application and related verifications. In addition, PRC benefits and services provided to non-custodial parents should be maintained in a separate assistance group record.

The assistance group record should contain sufficient documentation of the case activity on the PRC application, including an explanation of unexpected or unavoidable delays in processing the application.

G. Community Resources

The availability of resources within the local community may be explored prior to the authorization of PRC. A PRC assistance group may apply for and use any program, benefit or support system which may reduce or eliminate a presenting need.

Personnel authorizing PRC should be aware of any community resources that could assist a family in need of immediate services. Knowledge of available resources is necessary to advise applicants of other services within the community that may assist with meeting the emergent need(s). The PRC sample application in Appendix D provides a section for written documentation of agency attempts to locate and utilize resources within the community.

H. Overpayment Procedures

A county agency may choose to stipulate overpayment determination policies and repayment schedules in its PRC plan. Methods of repayment may include regular payments, community service hours (as determined by dividing the PRC payment by the current federal minimum wage), waiting until the minimum time period for receipt of that service has expired, or a combination of any of the above.

CHAPTER 4

Considerations For Targeted Populations

This chapter provides guidance on identifying and considering targeted populations with a focus on the community planning process. Three broad categories of targeted populations are discussed. These three categories include:

- f Low Income Job Seekers and Workers,
- f People with Barriers to Obtaining or Retaining Employment, and
- f Children and Families.

There are many instances where individuals within families fit into more than one target population and where services may benefit more than one target population.

All services provided to these targeted purposes under the PRC program must meet one of the four purposes of the TANF program and must also be considered “non-assistance.” Chapter 1 of this guide provides an overview of the federal and state requirements of the TANF and PRC programs.

This chapter also provides a broad outline for county agencies to engage in a community planning process to inventory and then identify those in need of services within their local community plans. From that process counties may then tailor services for targeted populations within their PRC Plans. All federal and state regulations apply for PRC services to targeted populations discussed in this chapter.

An example for a specific benefit or service is reflected in the chart “Example: List of Services & Benefits” found in Appendix I. All of the benefits and services in the chart are meant to meet purposes 1 and 2 of TANF, with the exception of pregnancy prevention services which are provided to meet purpose 3 of TANF.

4000 Community Planning

Locally, the County Family Services Planning Committee is responsible for the community planning process that advises each Board of County Commissioners. By involving local stakeholders, the community planning process inventories available services, assesses gaps in services, and most importantly determines priority strategies to meet local service needs. The planning process should identify targeted populations that are most in need of services. Some targeted populations will need services that must be funded by other community stakeholders, and other targeted populations may be served with TANF-funded PRC services. The services identified in the community plan by the

local County Family Services Planning Committee provides critical information to Boards of County Commissioners as well as local county department of job and family services to determine what services to targeted populations should be included in the county PRC plan. Please see Chapter 2 for additional information.

4010 Low Income Job Seekers and Workers

An essential goal of TANF is to assist needy families to move toward self-sufficiency. The target population of low income job seekers and workers includes those adults with minimal job skills or employment history seeking employment and those adults employed at low wages. Often these families are referred to as the working poor. Services are directed at helping those individuals enter, maintain and improve their employment. The focus may include both the custodial and non-custodial parents. Some of the services that may assist families include training, employment, and career advancement; transportation assistance; and work supports.

A. Training, Employment & Career Advancement Services

These are services that offer general or specific strategies for developing job skills, securing employment and advancing a career for job seekers on OWF and low wage employed parents not on OWF. While such services are allowable under the TANF program, many counties are maximizing the services delivered to low-income families by collaborating with other workforce and human service agencies, especially relative to the Workforce Investment Act (WIA), the One-Stop workforce system and adult education. HHS has issued a Program Instruction to provide examples of allowable activities related to job placement and development. See TANF-ACF-PI-2005-02, April 19, 2005, “Using Federal TANF or State MOE to purchase a business” for further guidance.

Services provided under a PRC plan may include, but are not limited to:

- f Employability assessment,
- f Job search, job placement, and transportation,
- f Work experience opportunities and case management provided to individuals with employment barriers, such as little or no work history,
- f Subsidized wages paid to an employer who employs an OWF participant,
- f Job skills training, re-training, job search, employment assistance, or other work-related services targeted at unemployed, needy non-custodial parents as well as TANF eligible custodial parents,
- f Job retention services or post-employment follow-up services, such as counseling, employee assistance, or other supportive services,
- f Linguistic and culturally appropriate services that help TANF eligible refugees obtain employment or participate in work activities,

- f Specialized training (or reimbursement for training) for private industry supervisors or job coaches to assist newly hired TANF individuals who have serious barriers to employment, and
- f Outreach activities to encourage employers to hire TANF recipients.

1. Workforce Investment Act

As a result of the WIA, Ohio requires that TANF agencies (i.e., county agencies) partner in the One-Stop workforce system so that TANF recipients will have access to more information about employment opportunities and services. As a one-stop partner, COUNTY agencies participate in developing workforce investment strategies that help cash assistance recipients secure lasting employment. It is important to note that the WIA regulations require that TANF recipients be given priority when adult training and employment funds are limited in a local area.

A county agency PRC plan can be developed to coordinate with WIA programs to provide workforce development for TANF-eligible individuals. Programs for work and training services for TANF-eligible families which meet one of the four federal purposes of TANF are allowable under the TANF program. Counties must assure that PRC work and training programs offered are specifically identified in the county's PRC plan and that eligibility requirements are stipulated in the plan.

2. Adult Education

Education and training programs can assist in breaking the poverty cycle for low-income individuals by helping them to qualify for and keep well-paying jobs. Some of these individuals have personal barriers such as low literacy and skills levels which interfere with successfully participating in educational assignments. Oftentimes a recipient's low basic skills can be attributed to learning disabilities and limited English proficiency (LEP). See Section 4020 of this chapter for additional information on learning disabilities and LEP. Most counties collaborate with other non-profit community organizations that have adult education programs designed to properly address educational barriers. Resources include Adult Basic Literacy Education (ABLE) programs, certificate programs provided by local community colleges, and on-the-job training that may also be provided through local community colleges.

B. Work Supports

Work supports encourage employment and promote job retention because they provide incentives for people to take jobs and help stabilize family income as families move from welfare or unemployment into work. PRC-funded work supports may include work expenses, emergency housing assistance, and transportation, among others.

Supplementing the incomes of low-wage, low-skilled workers is an approach many states and counties are using to help lift families out of poverty. Income supplements can be used as work supports to help reduce poverty and increase the incentive to work for families to leave welfare for work. The income supplements include Food Assistance,

nutrition programs, Child Care, health insurance, and the Earned Income Tax Credit (EITC) among others. In most cases PRC does not fund the aforementioned income supplements; however, PRC can be used to inform participants of the availability of such assistance.

1. Work Expense Allowance

Counties may use work expense allowances to help families meet work-related costs such as uniforms and tools. Such payments can help families escape poverty and promote job stability. When issuing work expense allowances counties must consider whether the allowance is reasonable. Under the PRC program counties can fund expenses for working families since the work allowance does not meet the family's basic needs and is therefore considered "non-assistance." Examples of such work expenses include uniforms, work tools, or other employment-related costs.

2. Wage Subsidies

Counties can provide temporary wage subsidies to employers as an incentive to hire eligible individuals. Wage subsidy programs assist individuals to prepare for, obtain, and maintain employment, especially individuals who face barriers to employment. Work subsidies are considered as non-assistance and as such counties can provide work subsidies under the PRC program. Such subsidies may include payments to employers or third parties to help cover the costs of employee wages, benefits, supervision and training. Section 5101:1-3-16 of the Ohio Administrative Code sets forth the parameters of PRC subsidized employment program.

3. Transportation

Providing transportation for low income families for employment and/or short-term training is a critical component of an employment-focused strategy. Transportation assistance is allowable up to the limits of the individual county's PRC plan.

Examples of possible PRC-allowable transportation services include:

- f Transportation allowance to cover incidental expenses and participation-related expenses for unemployed families,
- f Transit passes or tokens,
- f Arrange with another agency to use its buses or vans or share in the costs of purchasing transportation services,
- f Reimbursement for mileage, auto repairs, or auto insurance to facilitate finding employment and job retention,
- f Contracts with a private organization or service to refurbish previously owned cars and provide the cars to TANF recipients or provide financing support that enables recipients to purchase a car, and
- f Subsidies for transporting needy children to child care.

The Ohio Department of Transportation (ODOT) awards transportation coordination grants to communities to facilitate use of resources. Priority is given to counties with no public transportation. Applicants may also apply for funding to wrap around and fill gaps in existing services.

OWF work participants must have access to employment opportunities in order to successfully enter and remain in the labor force. For this reason, ORC 329.041 requires a county agency to meet with the representatives of the county transit system or the regional transit authority at least once each calendar quarter to discuss the transportation needs of the county's OWF participants, to review existing efforts and develop new options to meet those needs, and to measure the accomplishments of those efforts.

Since personal transportation is critical for families to maintain employment, transport children to school activities, and accomplish basic household tasks such as grocery shopping, county agencies may provide PRC services so that an individual can obtain an automobile or driver's license. Payments can be made for reinstatement fees and license plate fees. Two separate state agencies will accept county voucher payments for payment of vehicle services: 1) Ohio Bureau of Motor Vehicle Regional offices and 2) Ohio Deputy Registrars.

ODJFS does not condone or endorse the use of PRC to make payment for fines/reinstatement fees for individuals who have DUI convictions. Each county agency should contact their local county prosecutor regarding this issue.

4. Food Assistance and Medicaid Outreach

Food Assistance along with other work supports often make the difference in low-income workers transitioning into the workforce. Since the de-linking of Food Stamp and Medicaid eligibility from cash assistance, it has become increasingly important for counties to assure that those families applying for PRC services are considered for Food Assistance eligibility. A possible PRC-allowable program can include outreach for the Food Assistance and Medicaid programs.

5. Earned Income Tax Credit

Counties are encouraged to use the federal Earned Income Tax Credit (EITC) as a means to increase the income of low- and moderate-income working families. The EITC is a refundable tax credit that provides tax reductions and wage supplements for eligible families. Most beneficiaries receive the credit as part of their annual federal income tax filing and refund process. However, arrangements can also be made with the employer and the Internal Revenue Service to claim the credit on a monthly basis. Research has found that the EITC is effective in encouraging work among cash assistance recipients. A possible PRC-allowable program can include outreach for the Earned Income Tax Credit program.

C. Asset Building

Asset building strategies can help low-income families begin to build their economic security. Asset building strategies may include small business development, homeownership, or higher education. The Center for Social Development, a unit of the George Warren Brown School of Social Work (GWB) at Washington University in St.

Louis, has found that accumulating assets affect an individual's confidence about the future, willingness to deter gratification, avoidance of risky behavior, and investment in communities. The Center reports that in families where assets are owned, children do better in school, voting participation increases, and family stability improves. Other key outcomes reported by the Center are that reliance on public assistance decreases as families use their assets to access higher education and better jobs, reduce their housing costs through ownership, and create their own job opportunities through entrepreneurship. Two of the most used tools to help low-income families achieve economic self-sufficiency are Individual Development Accounts (IDA) and micro-enterprise development.

1. Individual Development Accounts

Federal and state laws allow TANF-eligible individuals to participate in Individual Development Accounts (IDA) programs. IDA programs are similar to savings accounts and enable participants to save for a home, an education or the start-up of a business. Money earned by participants is placed into the account and is typically matched by other sources, including TANF. The IDA account does not affect a recipient's eligibility for OWF, food assistance or Medicaid. IDAs can serve as incentives for recipients to find jobs and to use their earned income to save for the future.

On the HHS TANF Program Policy Q&As website, HHS has stated that under the broad flexibility of the TANF program, a state may use federal TANF funds in other types of asset-building programs that would support TANF purposes. Revised Code Sections 329.12, 329.13, and 329.14 allow county agencies to establish IDA programs for residents in their respective counties. The legislation allows families with incomes at or below 150 percent of the federal poverty level to save earned income, which may be matched with \$2 for every \$1 saved, for an education, to purchase a house, or to start a business. Matching funds may be provided by corporations, individuals, other entities, or the county agency. Section 329.14 details the specific information required for reporting on the IDA program activities. For additional information on reporting requirements, refer to Chapter Five.

2. Micro-enterprise Development

Micro-enterprise development is a strategy that provides loans, training, and technical assistance to help low-to moderate-income people to build income, assets, and economic self-sufficiency through entrepreneurship. Micro-enterprise is an allowable work option for public assistance recipients. Research has found that micro-enterprise development helps build lifelong skills and self-esteem, encourages further education and training, creates jobs, contributes to local community economic development, and increases local tax revenue.

County agencies can encourage and support micro-enterprise development by using PRC to fund the cost of micro-enterprise training; provide subsidized employment related to a participant's area of interest; provide work expense allowances; and provide support services for participants during the initial months of business operations.

D. Community and Economic Development

The community planning process provides an opportunity for collaboration among stakeholders that include employers as well as economic development professionals. In order to be allowable PRC activities, economic development activities must meet the purposes of TANF and serve TANF-eligible families. PRC programs centered around economic development should be used to supplement existing economic development funds and programs. The economic development activities supported by PRC funds should demonstrate an evident benefit to TANF-eligible families. HHS has issued a program instruction providing examples of allowable activities related to job placement and development. See TANF-ACF-PI-2005, April 19, 2005, "Using Federal TANF or State MOE to purchase a business" for further information.

A local Family Services Planning Committee could form subcommittees to examine community and economic development issues within the context of the community plan developed for a particular county. Programs developed as a result of the planning process serve to enhance local communities by identifying human service/economic development needs and strategies to address those needs. However, strategies that become part of a county agency PRC plan must identify activities that target low-income families in the community.

Collaborative approaches that target the needs of low-income families should:

- f Assess existing community and economic conditions and problems,
- f Develop and assist in the implementation of specific strategies for meeting the human service/economic development needs of the community,
- f Guide public and private organizations responsible for the provision of human services/economic development,
- f Assist public and private organizations to coordinate the provision of services in an efficient, non-duplicative way, and
- f Work with local Workforce Investment Boards to coordinate employment activities for TANF-eligible people.

Although not an exhaustive listing, examples of possible allowable PRC programs include, but are not limited to:

- f Staffing a community planning process for the County Family Services Committee or subcommittee that identifies the specific needs of TANF recipients toward achieving stable employment,
- f Loans to local small businesses that hire and train TANF recipients,
- f Supporting local micro-enterprise efforts and encouraging the creation and use of individual development accounts (IDA) to support micro-enterprise development,

- f Covering a share of the planning and development financing for local organizations or community development corporations that employ TANF recipients
- f Subsidized work programs or wage support can be used in conjunction with economic development funds to community development corporations,
- f Expansion or retention of employment opportunities,
- f Collecting and distributing information about job opportunities and/or prospective changes in the demand for specific occupations,
- f Providing information for job seekers of new job prospects and employers of available personnel, and
- f Providing job skills and remedial skills training for employees and potential employees through local community colleges.

4020 Individuals with Barriers to Obtaining or Retaining Employment

Many TANF recipients have barriers that affect their ability to successfully move from welfare to work. A significant number face multiple barriers to employment. *County agencies* are encouraged to work with OWF recipients in light of time limits and work requirements. Time limits and work requirements are challenges for *county agencies* as they try to serve individuals with multiple barriers. This section discusses some strategies to address these barriers.

A. Substance Abuse and Mental Health

Many research studies have found that up to a third of current public assistance recipients may be affected by substance abuse or mental illness. A number of the studies report that more than half of the individuals with substance abuse and mental health problems have two or more disorders. It has been reported that welfare reform's time limits, work requirements, and sanction policies make it difficult to find solutions to substance abuse and mental health problems. Many counties are collaborating to address this urgent need by using creative strategies such as:

- f Identifying individuals who have substance abuse or mental health problems by training caseworkers and co-locating trained specialists,
- f Helping individuals enter and follow through with treatment by improving access, monitoring participation, and providing wraparound support services,
- f Coordinating employment, substance abuse services, and mental health services that are supported with different funding streams, and building service delivery capacity, and
- f Determining appropriate combinations of work activities and treatment.

B. Affordable Housing

Research has found that the lack of affordable housing is a barrier to moving people from welfare to work and out of poverty. To address this issue, counties have developed strategies to address the affordable housing crisis. Some of the allowable PRC programs being used to increase access to housing for low-income families and to increase affordable housing include but are not limited to:

- f Pay families' rental costs by paying utilities, security deposits or rent,
- f Promote homeownership among low-income families by providing credit counseling, or credit repair services, mortgage down payment assistance, and
- f Help families save to buy a home by establishing IDAs (see Section 4010 for more information regarding IDAs).

C. Mental and Physical Disabilities

Severe mental or physical disabilities are significant barriers to employment. Many of these individuals have previously unidentified or undisclosed disabilities that present multiple and significant barriers to employment.

PRC programs can include services and supports to address barriers to employment for individuals facing mental and physical disabilities. Some of the possible services and supports include, but are not limited to:

- f Conducting employability assessments, reviewing cases and providing services and consultation, directly or through contracts,
- f SSI case management and/or legal representation for TANF-eligible individuals to pursue SSI eligibility,
- f Developing screening tools to identify mental and physical disabilities,
- f Training of staff regarding disabilities and impact on employability, and
- f Supporting partnerships with other agencies and organizations to collaborate to serve the needs of disabled TANF-eligible individuals in the community.

Every county agency must be cognizant of the applicable civil rights laws when dealing with individuals potentially identifiable as disabled. In addition to ensuring that the agency is accessible, county departments must consider legal implications of any screening tools or programs that are developed to serve the disabled. A helpful guide to understanding the requirements imposed by civil rights laws is the HHS Office of Civil Rights Guidance: "Prohibition against Discrimination on the Basis of Disability in the Administration of TANF (Temporary Assistance for Needy Families)." This document is available at: <http://www.hhs.gov/ocr/prohibition.html>

Coordinating and collaborating with other agencies (i.e., Vocational Rehabilitation and Supplemental Security Insurance program) who serve individuals with mental and physical disabilities is essential in ensuring that individuals receive appropriate services.

1. Vocational Rehabilitation

For individuals with disabilities, the vocational rehabilitation program provides a comprehensive array of services and supports including:

- f assessment of eligibility and need for services,
- f vocational counseling and guidance,
- f job development and placement services, rehabilitation technology services, training and post-secondary education, and
- f other services and supports to facilitate meaningful participation in employment and training services.

The Ohio General Assembly appropriates funds to the Ohio Rehabilitation Services Commission (ORSC) to be used as a match to provide vocational rehabilitation services to mutually eligible clients served by ORSC and ODJFS. The agencies are required to enter into an interagency agreement to exchange information to match the services provided to their mutual clients. ORSC works with the designated staff at each county agency to coordinate referrals of TANF eligible clients for vocational rehabilitation services.

2. Social Security Income Case Management

The federal Supplemental Security Income (SSI) program provides needs-based cash benefits to individuals 65 and older and individuals with disabilities, including disabled children. Receipt of SSI benefits can supplement purpose one of the TANF program by helping needy families care for a disabled child in their own home. The SSI program can provide these individuals with more appropriate services and long-term income support, without the work requirements and time limits associated with OWF. Shifting severely disabled cases from OWF to SSI also avoids counting these families in the 20% hardship cap or in the work participation rate.

County agencies may use different techniques to assess and screen TANF applicants and recipients with disabilities and to determine their potential eligibility for SSI. Ohio does not require any particular method of assessing and screening applicants for OWF or PRC, but it has a model for disability screening with the SSI Case Management program. Rule 5101:1-5-60 of the Ohio Administrative Code describes the program objective and structure.

- (a) The SSI Case Management program is an effort to identify participants applying for or in receipt of disability financial assistance (DFA) who may be potentially eligible for supplemental security income (SSI) and to help the participant in obtaining financial assistance from the social security administration (SSA).
- (b) The objective of the SSI case management program is to ensure that individuals applying for or in receipt of DFA who are eligible for SSI

receive the benefits to which they are entitled and to ensure that Medicaid is provided to all eligible participants....

HHS has determined that case management services, including information and referral and counseling, to help potential TANF recipients apply for SSI eligibility, constitute program expenditures, not administrative costs. HHS has also determined that states may use TANF funds for costs associated with providing legal representation to members of needy families who are pursuing SSI benefits.

D. Learning Disabilities

It is further estimated that over half of persons in adult education, social service programs, or employment-seeking programs may have some form of a learning disability that has prevented them from achieving academic and employment success in their lives.

The Office of the Assistant Secretary of Planning and Evaluation (ASPE), a research arm of HHS, reviewed several programs used by state and local agencies and found that there were at least four broad strategies to address the physical and learning disability needs of welfare clients:

- **Staff education and awareness.** Programs provide training to staff from welfare agencies and other community organizations to increase the understanding and of 1) how disabilities can affect clients and their prospects for employment, and 2) what types of special services and accommodations clients need to move from welfare to work.
- **Client identification.** Programs aim to improve accuracy in identifying clients who have disabilities, particularly learning disabilities. This objective is met by offering advanced training to welfare case managers to improve their ability to identify, support, and refer clients with disabilities for further assessment and specialized services. Some agencies also include specialized initiatives to develop brief screening tools that staff can use to detect learning disabilities.
- **Service coordination.** Programs use this strategy to improve coordination between agencies in order to help clients obtain available services. Coordination can be formal or informal.
- **Employment integration.** Programs with this strategy offer services directly related to employment, including vocational assessment, vocational training, remedial education, job training, job search and placement assistance, and transitional employment support. These programs are generally operated by organizations to which welfare agencies make referrals, i.e., nonprofit service providers.

According to ASPE, agencies generally will design their programs using a combination of the above strategies in order to meet their clients' needs.

Counties may email the ODJFS Work Activity Coordinators at WACTA@odjfs.state.oh.us for assistance with developing and implementing learning disabled initiatives.

E. Limited English Proficiency

Many low income individuals with limited English skills have limited educational attainment, test lower on basic skills tests, have poorer health compared to the native population and face limited opportunities for employment. To address this problem, many communities have developed special programs to assist limited- or non-English speaking public assistance recipients to move into the workplace by integrating language instruction with employment preparation. Examples of some of the programs include:

- f Incorporating employment readiness skills development based upon the Department of Labor's Security Commission of Achieving Skills (SCANS) workplace competencies,
- f Orienting English language instruction to the specific vocabulary, procedures and concepts needed for particular field or job, and
- f Providing English as a Second Language (ESL) instruction in the work environment so that the language objectives are determined by the worker, employer, and work tasks.
- f Providing interpreters and translators for TANF-eligible individuals.

As recipients of federal financial assistance, counties are required under Title VI of the Civil Rights Act of 1964 to provide meaningful access to their programs by Limited English Proficiency (LEP) persons.

Meaningful access means that the LEP person's situation can be effectively communicated to the service provider; the LEP person is able to understand the services and benefits available; and the LEP person is able to receive those services and benefits for which he or she is eligible in a timely manner.

Counties may contact ODJFS' LEP Coordinator in the Bureau of Civil Rights at Jorge.Irizarry@jfs.ohio.gov to request assistance in developing initiatives to serve their LEP customers.

F. Domestic Violence

Many low-income mothers with children experience domestic violence. Domestic violence disrupts the safety and stability of the family. In addition to both the emotional and physical violence, these families' problems are compounded by all the other poverty-

related issues. Research indicates that a substantial number of individuals and families known to child welfare and public assistance systems are past or current victims of domestic violence. For these families, efforts to achieve self-sufficiency must not jeopardize safety.

There is a continuing need for collaboration among providers at the local level who work with this population to provide more seamless service delivery, and to ensure that families are referred to service providers who have the requisite expertise. In communities across the country research points to a system of combined strategies in order to meet the needs of low-income abused women. This means that county agencies need to collaborate with domestic violence service providers. Clients are more inclined to acknowledge domestic violence to a domestic violence service provider than to a TANF caseworker. These domestic violence service providers offer specialized services that are frequently beyond the scope of most TANF agencies.

Coordination, collaboration, or contracting with other systems or service providers will ensure victims of domestic violence will have access to a wide range of services to meet their needs. Systems and organizations that TANF agencies should consider for coordination, collaboration, or contracting include law enforcement, child welfare agencies, child support enforcement agencies, health care providers, employers, schools, child care providers, education and training providers, substance abuse and mental health counselors and providers, legal services organizations, and the courts. Counties may want to consider these relationships through each county's community planning process in their County Family Services Committee.

The provision of services to the entire family when violence is occurring is essential in order to assist them in achieving self-sufficiency, and a safe, stable family environment. TANF agencies must offer benefits and services for an array of service needs, and ensure that staff is trained with appropriate domestic violence screening and assessment tools (or consider co-locating domestic violence professionals for this purpose).

1. Potential Services

PRC services provided by county agencies to TANF-eligible families experiencing domestic violence may frequently address a broad array of needs and supplement services provided by domestic violence shelters. Allowable PRC services may include, but are not limited to:

- f Temporary shelter services,
- f Personal and family support services, including domestic violence counseling,
- f Housing,
- f Relocation assistance,
- f Household expenses, and
- f Community outreach.

2. Screening and Assessment Tools

Research indicates that disclosure rates of family violence in TANF agencies are lower than the prevalence of domestic violence identified by research. This is in line with research that shows that domestic violence advocates obtain four and five times more disclosures than TANF caseworkers. Working against disclosure to caseworkers are client concerns about trust, expertise, and confidentiality. The discrepancy between rates of family violence reported by researchers and the rates reported by TANF agencies suggests that agencies need to improve their screening and assessment practices. These discrepancies can be mitigated through the co-location of trained domestic violence providers or possibly through improved training of TANF caseworkers using screening and assessment tools.

4030 Children and Families

An integral part of welfare reform is the prevention of welfare dependency among future generations. Counties have the flexibility to develop PRC programs to promote early childhood education, teen pregnancy prevention, stay-in-school initiatives, and other programs that aim to give children and youth the support they need for healthy development. PRC programs cannot fund foster care services, juvenile justice services, or medical services. Please see Chapter 1 for more information regarding PRC limitations.

A. Help Me Grow

Early childhood is a critical period of a person's development. It is critical to developing skills, emotional attachments, and intellect necessary to be a successful adult. A significant percentage of young children in Ohio live in poor families. The development of these children may be at risk because the families lack resources and information necessary for healthy child development. Failure to address these needs may result in school failure, health problems, and future welfare dependency. A strategy to promote healthy child development will pay dividends in the promotion of school success, reduction of abuse and neglect, and government dependency. Ohio uses the services of the Help Me Grow program to support families' success in raising healthy children.

Help Me Grow is a program of coordinated services and supports for parents of newborns, infants and toddlers who have or are at-risk of developmental delay or disability. Help Me Grow is designed to support local efforts to:

- f Provide home visits to assess the health of newborns,
- f Help new parents by providing information on child development and available programs and services,
- f Provide early identification of children with developmental delays, as well as information, guidance and therapeutic interventions,

- f Provide screening for children’s health, hearing and vision, and overall development, and
- f Provide literacy training for all parents and support them as full partners in their child’s education.

Eligible populations may include families with children under the age of three and pregnant women with incomes at or below 300 % of the federal poverty level. The county agency sets the poverty threshold for TANF Help Me Grow services for their county (not to exceed 300%). Eligibility criteria are listed in the county PRC plan. More information on Help Me Grow is available at <http://www.ohiohelpmegrow.org/>

The PRC program may be used to support the following Help Me Grow services:

- f Parent education,
- f Linkages to existing services,
- f Case management and service coordination,
- f Family support,
- f Individual family service plans,
- f Information and referral to other services, and
- f Home visitation.

B. Children at Risk of Abuse or Neglect

Purpose 1 of the TANF program is to provide services to assist families so that children may remain in their own home. Children who have been abused and neglected are at great risk of failure to thrive and not becoming productive members of society. The risk can be minimized by strategies to help their parents improve their parenting skills. Efforts to reduce harm, as well as reduce foster care placement, can improve the health and safety of children. There are many causes of abuse and neglect including substance abuse in the home, domestic violence, and a variety of other stressors within families such as severe financial problems.

There are situations where families being served by a county agency intersect with the child welfare system. Counties should give consideration to these situations when developing their PRC plans.

A county that chooses to use their PRC program to support child welfare services delivered through a separate PCSA must identify these services in a memorandum of understanding (MOU) between the county agency and the PCSA as well as include them in the county PRC Plan. See earlier chapters for more specific guidance regarding PRC Plan requirements.

Certain recipients of OWF cash assistance must have a self-sufficiency plan. Some of these recipients also have a child welfare case plan. PRC services may be incorporated in

either plan or both plans. Coordination of these plans between the county agency and PCSA with the family is essential for supporting a family's success. For example, one case plan/self-sufficiency coordination issue is the timing of reviews. Agencies may wish to set up the self-sufficiency plan and case plan so that the Semi-Annual Administrative Review and six-month re-application for OWF can be conducted at the same time. It is also good practice for the PCSA and the county agency workers to develop the self-sufficiency plan and case plan together with the family.

Each county agency and PCSA should work closely together to coordinate child safety issues for families that may include PRC services. Below are some recommended elements for consideration that may incorporate PRC services:

- f Assessment: Define a process for a face-to-face meeting with parents to determine the ongoing needs of the family and continued safety of the children. Develop appropriate strategies that will assist families in meeting the needs of their children.
- f Services: Provide information to the family regarding available services to meet the needs of the family.
- f Communication and Support with the PCSA: An ongoing working relationship between staff of the county agency and PCSA to ensure child safety. A staffing plan should be developed to specify how this function will be managed by both the county agency and PCSA.
- f Monitoring: The coordination of child safety issues should be monitored by both the county agency and PCSA and reviewed on a regular basis for any needed improvements.

2. Family-Focused PRC

A PRC program may include preventative or protective services to address treatment issues for eligible families. Some of the services that may be provided include family preservation services, family reunification services, respite care services, kinship care/navigator services, and community outreach. The following services are allowable PRC services for this targeted group. This is not intended to be a comprehensive listing of services but merely the more common PRC services funded by county agencies to serve this population:

a. Family Preservation

The objective of family preservation services is to preserve the family as a unit and prevent unnecessary placement of the children in alternative living arrangements. Family preservation services augment and expand the protection, supervision, care, and support that are provided through the primary family unit.

Adoptive families may be eligible for these services to the extent that they meet PRC requirements. Services include a variety of short-term, intensive, home-based intervention services. This would include case management and counseling for families experiencing a crisis that is so severe the children are at imminent risk for placement outside the family setting. Services are aimed at ameliorating the

underlying causes of family dysfunction, are generally time-limited, of short duration and available on a twenty-four hour basis. Services may also include classes or other educational opportunities for parents or potential parents who want to acquire the knowledge and skills to be effective in their parenting role.

b. Family Reunification

These services target families with children in foster placement whose prospects for successful reunification are good. Reunification services include an array of supportive services needed by the family to attempt reunification, including supervised visitation in the home by the child, trial placement with the family and whatever home-based services are required to facilitate permanent reunification. Services may include home management instruction, parenting skills development, stress management, counseling, case management and tutoring. Services may also include classes or other educational opportunities for parents or potential parents who want to acquire the knowledge and skills to be effective in their parenting role.

c. Respite Care

Respite care services are those designed to provide temporary relief of child-caring functions that may include, but are not limited to crisis nurseries, day treatment, and in-home services. This type of respite care is not Foster Care respite, but intended for the custodial family to receive a break.

d. Kinship Care/Kinship Navigator

These services provide information, referral and supportive services for relative caregivers, legal guardians or court-ordered legal custodians responsible for the day-to-day care of a minor child (not their biological child) residing with the caregiver. These may also include Kinship Navigator services such as identification of kinship caregivers, assessing needs, facilitating access to services, and information and referral to appropriate providers (e.g., legal services, child care services, respite care services, training, support groups and financial assistance). Some programs may include the development of community services to meet the needs of the kinship caregivers. Services may include classes or other educational opportunities for caregivers/custodians who want to acquire the knowledge and skills to be effective in their parenting role.

e. Community Outreach

Community outreach may include the use of billboards, print, and broadcast media, and other general community information/awareness activities designed to inform a general or targeted population about community needs and services available. Often community outreach is designed to prevent problems or at least prevent community and individual conditions from becoming more severe.

f. Kinship Caregiver Program

In accordance with House Bill 541 of the 132nd General Assembly (H.B 541) county agencies must amend their PRC plan to include the Kinship Caregiver Program. This program is intended to provide reasonable and necessary relief of child caring functions so that kinship caregivers, as defined in ORC 5101.85, can provide and maintain a home for a child in place of a child’s parents. As part of the PRC plan amendments county agencies must include the following;

- The Kinship Caregiver Program must meet TANF purpose 1;
- An application must be submitted to the county department of job and family services by the kinship caregiver;
- The PRC plan must include a definition of “relief of child care functions”;
- Each child living with a kinship caregiver shall make up a PRC assistance group of one; and
- Income of the child shall not exceed 200% of the Federal Poverty Level.

45 CFR 260.30 defines a “minor child” as an individual who has not attained 18 years of age or has not attained 19 years of age and is a full-time student in secondary school or equivalent. While H.B 541 more broadly defines a “child” as a person who is 18 years of age or younger, the Kinship Caregiver Program should base eligibility on the federal definition of “minor child.”

C. Youth in Transition

Youth in transition include teenagers and recent high school graduates who need to become productive, employable adults. A youth is a child who is less than 18 or is a child less than 19 if enrolled full time in secondary school or equivalent. Many of these youth face greater risk than middle or higher income children of poor educational, health, and social outcomes. Counties have the opportunity to focus on improving the well-being of youth within the welfare system by developing PRC programs to support a variety of initiatives and programs. Youth education and support and teen pregnancy prevention are examples of some of the programs counties can use to serve youth.

1. Youth Education and Support Services

Youth education and support services can help communities prevent welfare dependency among future generations. Counties can provide creative services such as early childhood education, teen pregnancy prevention, stay-in-school initiatives, and other programs that aim to give children and youth the support and care they need for healthy development.

Some of the allowable PRC services for TANF-eligible youth include but are not limited to:

- f After school programs,
- f Family and youth intervention services (truancy prevention, mentoring and tutoring for personal growth, peer support, lice eradication, counseling and

- linkages), and
- f Youth workforce preparation and employment programs.

Many counties are creating PRC programs to support initiatives under WIA to serve mutually-eligible youth. County agencies are serving on the WIA Youth Councils to help coordinate youth development services in their local areas.

2. Teen Pregnancy Prevention

Preventing and reducing out-of-wedlock pregnancies is the third purpose of TANF. The federal law requires Ohio to establish annual, numerical goals for preventing and reducing the incidence of these pregnancies, with a special emphasis on teenage pregnancies.

Research has found that out-of-wedlock childbearing has many negative economic and social impacts, particularly for teenagers and their children. Teen parents who bear children early are less likely to finish high school, which contributes substantially to diminished employment prospects; and are more likely to receive government assistance. Children of these parents are more likely to be in poor health, experience fewer successes in school, and have more behavior problems (National Campaign to Prevent Teen Pregnancy, 2001). Pregnancy prevention services are not limited to needy families and can be targeted to individuals at risk of out-of-wedlock pregnancy regardless of economic need.

The following are some of the services that a county could consider for its PRC program that would accomplish purpose three of the TANF program:

- f Family planning (including birth control), clinical and follow up services,
- f Abstinence education programs,
- f Pregnancy prevention programs and services for youth,
- f Teen pregnancy prevention campaigns, and
- f After-school programs that provide supervision when school is not in session.

D. Family Formation

Research studies support the belief that family formation and maintenance of two-parent families can play a crucial role in reducing many poor families' dependence on public assistance. In addition, findings from several studies have reported that children growing up in households without two parents are at greater risk of academic, physical, emotional and behavioral problems. Counties have the flexibility to design programs and policies to support families who want to form or strengthen their marriages.

Purpose 4 of the TANF program encourages formation and maintenance of two-parent families. Following are several examples of allowable activities that a county agency may consider for its PRC program:

- f Parenting skills training,
- f Premarital and marriage counseling and mediation services,

- f Activities to promote parental access and visitation,
- f Job placement and training services for noncustodial parents,
- f Initiatives to promote responsible fatherhood and increase the capacity of fathers to provide emotional and financial support for their children,
- f Crisis or intervention services, and
- f Employment & training and related support services.

E. Out-of-Wedlock Pregnancies

Preventing out-of-wedlock pregnancies is purpose three of the TANF program. Counties have the flexibility to develop comprehensive approaches to prevent unwed births among several populations: young females and males before they become sexually active; young people of both sexes who are sexually active, teen parents who are at higher risk of subsequent pregnancies; and adult unmarried men and women. See section 4030 Youth Transitions, Teen Pregnancy Prevention of this chapter for allowable pregnancy prevention services.

F. Noncustodial parents

Historically, a significant number of noncustodial parents have found limited employment opportunities, and have not been engaged financially or emotionally in the lives of their children. Many noncustodial parents are involved in the lives of their children to some extent and provide some financial support, but would like to do much more. Federal regulation defines a non-custodial parent as: “a parent of a minor child who: 1) lives in the state; and 2) does not live in the same household as the child” 45 CFR 260.30.

Under the TANF program, states have the flexibility to develop fatherhood programs to assist low-income fathers with increasing their employability and parental skills. Fathers who are employed are more likely to become emotionally connected to their children, thus reducing the risks of negative outcomes among our youngest generation. Consistent payment of child support by non-custodial parents to their families is likely to alleviate child poverty.

A county agency may provide PRC services to a noncustodial parent of a minor child(ren) who resides in the state but not in the household with their child(ren). Services such as paternity establishment, location and collection services, however, are funded through the IV-D program. Counties may not include these services in their PRC plans.

Those county agencies who wish to provide PRC services to this assistance group have options in the types of eligibility criteria to consider for issuing PRC services. Examples of eligibility criteria for noncustodial parents include, but are not limited to, the following noncustodial parents who:

- f Are ordered into an employment program by a court or referred by the child support enforcement agency (CSEA) and are also complying with the employment program to find a job;
- f Are currently cooperating with child support;
- f Who establish or who are in the process of establishing responsibility for their child(ren) through the CSEA;
- f Who have at least made one payment to the CSEA within a specified time period prior to PRC application;
- f Who are employed a set minimum number of hours per week;
- f Who have a current child support order and the intent to meet his/her financial obligation; and
- f Who have a current seek-work court order and are referred by the CSEA administrative order.

Allowable PRC services under TANF for non-custodial parents may include, but are not limited to:

- f Employment-related expenses, financial management services, job search, job placement, education, and job training services;

- f Transportation services for employed individuals or for unemployed individuals as a non-recurring, short-term benefit only;
- f Nonrecurring short-term basic needs;
- f Counseling, including a broad array of services such as parenting classes, mediation services, premarital and marriage counseling, activities to promote parental access and supervision, responsible fatherhood initiatives, and increasing the capacity of fathers to provide emotional support for their children;
- f Paternity establishment counseling;
- f Anger management; and
- f Access and visitation mediation.

Counties have also begun to pay special attention to the parenting needs of incarcerated parents. To address the needs of this special population, some counties are implementing programs to improve the relationships with children and their parents while the parent is incarcerated. Some of the programs are focusing on providing the services to promote fatherhood, increasing the capacity of fathers to provide emotional and financial support for their children, and crisis or intervention services.

G. Emergent Needs

Families can become unstable for a variety of reasons. Families experiencing poverty are least able to cope with a crisis due to a lack of resources as well as a lack of social support systems. Services for families in crisis may include, but are not limited to, TANF-eligible families in need of disaster assistance, and services to address non-recurrent short term needs. These services provide families with limited, nonrecurring financial assistance that enables them to cope with crisis situations or episodes of need.

The following are types of services that can be funded using TANF; however, these types of service are not intended to be a comprehensive listing of services but merely some of the more common services to address the needs of families in crisis:

1. Disaster Assistance

These services provide benefits to eligible families who have sustained losses as a result of state-declared natural disasters. Counties are encouraged to consider disaster assistance as part of their PRC Plan to expedite assistance when necessary. When the governor declares a county to be in a state of emergency, the county agency becomes eligible to receive up to \$200,000 in PRC funds to serve families affected by the disaster. Families can receive up to \$1500 to cover losses incurred as a result of the disaster. The county agency can exceed the \$1500 by providing additional services under their PRC plan. In these situations, the economic need standard should not exceed 200% of the Federal Poverty Level.

Even without additional funding due to a governor-declared emergency, counties may authorize PRC benefits as a result of local disasters, provided that it is addressed in their PRC plan. The economic need standard should not exceed 200% of the Federal Poverty

Level. Please see the Disaster Plan Resource Guide located on the ODJFS inner web at: <http://innerweb/Ofam/pdf/DisasterPlan.pdf>

2. Non-recurring Short Term Benefits

Ohio provides TANF cash assistance to meet a family's ongoing basic needs through the OWF Program. Therefore, county agencies may not provide any benefit or service that falls within the TANF definition of "assistance" through the PRC program (see Chapter 1). This prohibition does not preclude providing PRC benefits and services for nonrecurring, short-term needs not to extend beyond four months. These services and non-assistance benefits address a specific crisis situation or episode of need that may include food, clothing, shelter, utilities, home repairs, household goods, personal care items, and general incidental expenses.

It is important to reiterate that HHS stated in the preamble to the federal regulations 64 Fed. Reg. 17761 (April 12, 1999) that:

We did not want a state to bundle several months' worth of assistance into a single assistance payment in order to avoid TANF requirements for itself or the family....It is not appropriate for States merely to condense the time period over which they pay assistance to needy families so that they can categorize the benefits as "non-assistance" and avoid TANF requirements.

As a result, a county agency cannot design a PRC program that provides a benefit that lasts four months so that it fits within the definition of "non-assistance." The program must also meet the requirements that it is meant to deal with a short term crisis situation or episode of need, is not intended to extend beyond four months and is not intended to meet recurrent or ongoing needs.

Chapter 5000

Data Reporting

Ohio's PRC program is a critical tool to assist low income families in achieving their goals of improving family income, supporting family transitions from public assistance to employment, and preventing future dependency. As the TANF administering agency in Ohio, ODJFS) needs to convey the importance of the PRC program to the public and to the General Assembly. Additionally, because the PRC program is funded with public funds, ODJFS and the county departments are accountable to the public as well as the federal and state government for appropriate use of public funds.

As a result, ODJFS and the county agencies must report data on the:
Types of services that counties provide through their PRC program,
Numbers of families and individuals served,
Expenditures attached to those services, and
Outcomes achieved through those services.

5000 "Hard" & "Soft" PRC/ OWF Support Services

The TANF reporting system consists of two reporting mechanisms based on two primary service categories of "hard" and "soft" services. All county agencies are required to report on the hard and soft services they provide. Hard services are reported through the client registry information system-enhanced (CRIS-E) and soft services are reported through the TANF Web Reporting Tool (WRT) located at <http://tanfreporing.ohio.gov/>

- "Hard" services are benefits having cash value (e.g., rent payments) that are provided to clients either as PRC services or OWF support services. These services are automatically reported through CRIS-E at the time PRC is authorized. The reporting categories, codes and service definitions for hard services can be found at: <http://tanfreporing.ohio.gov/> under "WRT Hard Category Descriptions." The codes and definitions can also be found in CRIS-E on the CRIS-E Reference Table "PRC Reason Codes" (TPRX).
- "Soft" services are services without cash value to the recipient (e.g., job training and education, after-school programs, etc.) that are provided to clients either as PRC services or OWF support services. Data on these services is collected through the TANF WRT. Using the TANF-WRT mechanism, counties report monthly data on soft services by service category, sub-category, number of individuals served, and service costs. The service categories and sub-categories are listed on the TANF WRT home page under "WRT Soft Category Descriptions" at: <http://tanfreporing.ohio.gov/> Counties may submit the data on a monthly basis, or

on a quarterly basis as long as it incorporates month-specific data and is submitted no later than 45 days after the end of the quarter.

County agency staff that use the TANF WRT must register using the TANF WRT Account Registration Form and the JFS 07078, both of which are located on the WRT log-in page. Staff should contact their county Security Administrator to complete and submit the registration form and the JFS 07078. Once both forms have been submitted, a system user name, called an LDAP ID, an initial password and instructions indicating that you have access to the TANF WRT will be sent to you via email.

Service providers may register as WRT users so they can enter the service data directly into the WRT with county sign-off prior to data submission to ODJFS.

5010 Individual Development Account Reporting

For counties electing to implement an Individual Development Account program, section 329.12 Revised Code and rule 5101:1-3-18 of the Ohio Administrative Code require each county agency to submit a semi-annual report to ODJFS based on information collected by the fiduciary organization. Section 5101.971 Revised Code requires ODJFS to subsequently submit an annual report to the governor and legislature about the IDA program.

The county agency must complete the IDA reporting form (see Appendix J) with the information that the county has received from the fiduciary organization and send to ODJFS twice a year with the following deadlines: report data by March 1 for the previous July through December period and by September 1 for the previous January through June. Fax or email the report to the Office of Family Assistance Cash Assistance Policy Section, 614-466-1767 (fax) or Program-Policy@jfs.ohio.gov

Appendix A

Use of PRC Funds for Previously Authorized IV-A Medical Services

If a county chooses to provide these medical services under their PRC plan, the county must use the eligibility requirements that were in effect August 21, 1996, including the income and resource methodology, the scope of services and duration of the services (i.e., once in a twelve-month period).

The following rules set forth the eligibility criteria that were in effect August 21, 1996, for the provision of emergency medical services under Ohio's former AFDC state plan. These are the requirements the county agency must use to provide medical services under their PRC plan.

Former OAC 5101:1-7-18 - Covered Medical Services

Medical services which may be considered under the scope of coverage for emergency assistance payments are medical supplies, laboratory fees, pharmaceutical services, physicians care, and dental services. When emergency assistance (EA) is issued for any of these services the emphasis is on payment for that emergency which, if treatment were delayed, would result in loss of life or threat to health and safety of the assistance group member.

Payment for medical services under the emergency assistance program is made according to the actual billed charge. The maximum payment amount allowed for EA medical services is the EA payment standard for the assistance group or the actual amount needed to meet the emergency within the limits set for the particular item, whichever is less.

In some situations, the maximum payment that can be made for medical services will not meet the emergent need. However, in these instances an exception is made to the general rule that EA is not issued unless the amount authorized plus the co-payment will meet the emergency. When the medical cost of the medical service exceeds the maximum amount allowed for that service, the maximum EA payment shall be authorized even though the amount is not sufficient to meet the emergency.

In some emergency situations, when medical services have already been obtained, an emergency assistance payment may be authorized for these services, provided the emergent and financial need is verified and an application for emergency assistance is made within forty-five calendar days of the date the service was provided. When the cost of the medical service exceeds the maximum amount allowed for that service, the maximum payment shall be authorized.

The following is an all-inclusive listing of medical services that may be met by an emergency assistance payment.

Emergency assistance may be issued for medical supplies that are needed to protect the health and safety of an assistance group member if ordered by a physician or other licensed practitioner of the healing arts. Medical supplies are limited to the following items:

- Hypodermic needles and syringes for the diabetic.*
- Medically necessary dressings such as surgical pads and tape.*
- Oxygen.*
- Catheters and bed pans.*
- Bags, frames, and supplies for colostomies, ileostomies, and urethrostomies.*
- Atomizers or nebulizers obtained from a pharmacy.*

A thirty-day supply of any one or a combination of medical supplies listed above is the maximum which may be considered for payment. The assistance group record must have documentation that the medical supplies are ordered by the physician and contain an itemized list of supplies from the provider of the service.

Emergency assistance may be issued for laboratory and x-ray services that are ordered by a physician or other licensed practitioner of the healing arts. Documentation must be contained in the assistance group record to substantiate the physician's orders that the tests are medically necessary, and there must be an itemized list of services needed.

Emergency assistance coverage may include payment for pharmaceutical supplies but is limited to drugs prescribed by a physician or dentist. Insulin is included. A thirty-day supply of a prescription of insulin is the maximum to be considered for payment. Emergency assistance may not cover standard "medicine cabinet" items such as first aid supplies, vitamins, cold remedies, or any nonprescription drugs. The assistance group record must have documentation such as a copy of the prescription to substantiate the need for pharmaceutical supplies.

Emergency assistance authorized for physician's care is limited to emergency treatment provided by a licensed physician. Payment may be authorized for the minimum appropriate treatment to relieve the pain or infection. The emergency treatment must be performed in the physician's office, hospital emergency room, or the outpatient department of a hospital or clinic.

Emergency assistance may be issued for emergency dental care. Payment may be authorized for the minimum appropriate procedure to relieve the pain or infection. The emergency care must be performed in the dentist's office, the hospital emergency room, or the outpatient department of a hospital or clinic.

Former OAC 5101:1-7-04 - Eligibility Periods

County departments of job and family services will determine eligibility for all emergency assistance requests by taking into consideration the following time frames:

A "standard of promptness" is the period of time beginning on the date a signed application is received in the county department of job and family services and ending ten calendar days later. Due to the intended focus of the emergency assistance program, county departments of job and family services are encouraged to process emergency assistance requests within ten calendar days of receipt of the signed application.

The "budget period" is the thirty-calendar-day period beginning with the date a signed application is received in the county department of job and family services. The income and resources available during this thirty day period only are used in the computation of financial need.

The "authorization period" is the period of time beginning on the date that the emergency assistance is approved by the eligibility determiner and ending thirty calendar days later. After the emergency assistance payment is authorized for one service, there are to be no further emergency assistance payments issued. Once authorization of emergency assistance has been completed, county departments of job and family services shall enter the emergency assistance approval information into CRIS-E.

Only one thirty day authorization period may occur in any twelve consecutive months. The first day of the authorization period is also the first day of the twelve-month period during which only one thirty-day authorization period may occur.

The "application date" is the date that a signed ODHS 7336, "Emergency Assistance Application" is received in the county department of job and family services.

Eligibility Requirements - Former OAC 5101:1-7-08

Certain eligibility requirements must be met in order to determine financial need for emergency assistance (EA). These eligibility requirements are age, residence, living arrangement, and income. Certain resources in excess of fifty dollars must be considered toward the co-payment for which the family is responsible.

The assistance group must have both an emergent need and a financial need. Therefore, if the assistance group has an emergent need but does not meet one of the eligibility conditions, there is no eligibility for EA.

Verification of the eligibility requirements is required only for income and resources. For EA purposes, it is important to evaluate the income and resources available at the time of application which may be used towards meeting the emergent need.

The eligibility requirements of age, residence, and living arrangement may be verified for EA purposes if the situation indicates clarification is needed; i.e., the prudent person concept is applied. Due to the nature of the EA program, the determination of what should be subject to verification should be construed to the benefit of the assistance group.

Recipients of Aid for Dependent Children (ADC) or Disability Assistance (DA) are considered automatically to meet the eligibility requirements of age, residence, and living arrangements. However, eligibility for ADC or DA does not constitute automatic eligibility for EA. The factors of income and resources must be evaluated and a determination made of whether financial need exists.

Recipients of Medicaid (Aged, Blind or Disabled), SSI, and food stamps do not automatically meet any eligibility requirements. Eligibility must be determined as for any other applicant of EA.

The following paragraphs outline the eligibility requirements necessary to determine financial need for EA. Age, residence, living arrangement and income requirements must be met in order to have a financial need for EA.

There is no minimum age requirement for the parent or relative with whom a child lives or for an individual acting as head of a household. Any individual under the age of twenty-one, unless married or head of the household, is considered a child to be included in the family for EA purposes. There is no requirement for the child under age twenty-one to be attending a school, college, or university, or to be enrolled in a training program. There is also no requirement that the child under age twenty-one be registered for work.

Residence in the state is a requirement for EA. Residence is established by living in the state voluntarily with the intent to remain here permanently or for an indefinite period of time. Residence is also established by a person who is not receiving assistance from another state and entered the state with a job commitment or seeking employment,

whether or not currently employed. A child is a resident of the state in which the caretaker is a resident.

EA is available to a child under age twenty-one and any other member of the household in which he is living provided the child is now living or has been living with a specified relative within six months prior to the month of application.

The term "specified relative" is limited to those individuals outlined in rule 5101:1-3-04.

The term "living with" shall include persons who would be physically in the home except for circumstances that would require temporary absence, such as hospitalization, detention in a juvenile home until a court commitment, attendance at school, visiting, vacationing, and/or trips made in connection with current or prospective employment.

Assistance group members must be living in independent living arrangements. EA may not be issued to persons living in medical or public institutions.

Former OAC 5101:1-7-09 - Use of Resources

A general principle of the emergency assistance (EA) program is that resources which an assistance group member has currently available must be applied toward the emergent need. The resources to be considered for EA are those which are both liquid and available during the budget period to help the assistance group meet the emergent need.

Resources do not include the value of real property, automobiles, life insurance, household goods, benefits received under the provisions of the Agent Orange Compensation Exclusion Act (Public Law 101-201) received on or after January 1, 1989, loans and scholarships under the program in title V of the Higher Education Act or under Bureau of Indian Affairs Student Assistance program and personal effects.

"Liquid assets" are those resources which are in cash or payable in cash upon demand. "Liquid assets" are those which can be converted to cash within the budget period so that the funds are available to help meet the emergent need. The most common types of liquid assets are cash on hand, savings accounts, checking accounts, stocks, bonds, mutual funds, promissory notes, and burial accounts.

"Available liquid assets" are those in which the assistance group member has a legal interest and the legal ability to use or dispose of them. If both legal interest and ability to use the liquid resource do not exist, the value of the liquid asset is unavailable for EA. This definition is currently found in ORC 5107.02.

Resources owned by one assistance group member are considered available to all other assistance group members.

If ownership of a resource is shared by an assistance group member and a person who is not a member of the assistance group, the liquid resource is considered available on a prorated basis unless evidence is produced to show the resource is unavailable.

Verification of liquid assets is required. A current verbal or written statement from the source is acceptable verification. Any verbal verification must be obtained from the financial institution, stock broker, etc. Due to the nature of the EA program, it is expected that verification is readily obtained. Therefore, telephone verification with the applicant's release of information is permissible. Verification that is obtained by telephone must be clearly documented in the assistance group record as to the name and position of the person supplying the information, the date the verification was obtained, the current amount of the resource, and the name of the individual who obtained the verification.

Former OAC 5101:1-7-10 -Use of Income

All income which is received or expected to be received by any member of the EA assistance group during the thirty-day budget period is considered when determining financial need. This includes all income which is normally exempt or disregarded when determining eligibility for Aid for Dependent Children (ADC), or Disability Assistance (DA), except income received under the provisions of the Agent Orange Compensation Exclusion Act (Public Law 101-201) received on or after January 1, 1989 and income described in the fourth paragraph of this section. It does not include income which was received prior to the thirty-day budget period or income which will be received after the thirty-day budget period.

When all members of the EA assistance group received ADC or DA as their only source of income, the income requirement is considered automatically met. If the EA assistance group has other income in addition to ADC, or DA, the income requirement is not automatically met. Eligibility must be determined, and the amount of the ADC, or DA payment is considered unearned income.

When a member of the EA assistance group received unearned income, the entire amount received or expected to be received during the thirty day budget period is to be counted.

Effective July 1, 1993, all student financial assistance provided under the programs in Title IV of the Higher Education Act or under the Bureau of Indian Affairs student assistance programs shall be disregarded as income and resources in the determination of eligibility and level of benefits in the EA program. Loans and scholarships, other than those provided under the programs in Title IV of the Higher Education Act or under the Bureau of Indian Affairs student assistance programs, are treated as unearned income; however, when designated for tuition, books, fees, etc., those amounts shall not be counted. Some loans and scholarships, other than those provided under programs in the Title IV of the Higher Education Act or under the Bureau of Indian Affairs student assistance programs, contain a compilation of tuition, living expenses, etc. In these cases, the amount for educational expenses must be determined and shall not be counted.

The gross amount of the unearned income received by any member of the EA assistance group during the budget period is counted for emergency assistance purposes. There are no deductions allowed for costs of obtaining this income or for specific expenses such as taxes, insurance premiums, etc.

All types of unearned income received by any member of the assistance group must be counted. "Earned income" is that which the assistance group member must perform some type of labor or service to receive. The gross amount of earned income received or expected to be received during the thirty-day budget period must be considered for emergency assistance.

Deductions from work-related expenses may be allowed from the gross earned income of each employed EA assistance group member to arrive at net income. Because of the

nature of EA, it may not always be possible to verify the exact amount of work-related expenses in a timely manner. Therefore, the earned income exclusions shall be limited to ninety dollars for work expenses and one hundred seventy-five dollars per child, or two hundred dollars if the child is under age two for child care costs. The ninety dollar and one hundred seventy-five dollar (or two hundred dollars if the child is under age two) disregards are not adjusted for part-time employment. If verification of work expense is readily available, the actual verified amounts which will be deducted from the gross earnings or paid by the individual during the thirty-day budget period may be allowed.

Following is a list of the earned income exclusions to be deducted from gross earnings of each employed member of the assistance group when allowing the actual verified costs. This list is all-inclusive and may not be expanded.

Mandatory deductions of involuntarily withheld income taxes (federal, state, and city), social security, compulsory retirement, unemployment and disability insurance contributions.

Transportation to and from work. A mileage allowance equal to the amount which is reimbursed to state staff is deducted when the individual uses his own vehicle.

Child care costs.

Expenses for union dues involuntarily withheld.

Miscellaneous deductions required by the employer.

The following types of income are excluded from either earned or unearned income. The amount of the exclusion is limited to the actual verified expense.

Court-ordered child support and alimony when paid to an individual not included in the eligible assistance group.

Court-ordered garnished payments.

Verification of income is required for EA. Written or verbal verification from the employer must be obtained. Phone verification with the applicant's release of information is permissible. Any verification that is obtained by telephone must be clearly documented in the assistance group record as to the name and position of the person supplying the information, the date the verification was obtained, the current amount of the income, and the name of the individual who obtained the verification.

When income to the EA assistance group fluctuates from month to month, the eligibility determiner should use the most currently available verification and predict the income for the budget period unless it is indicated the situation will be different. This documentation must be retained in the assistance group record.

The EA assistance group's net unearned income is added to the EA assistance group's net earned income in order to calculate the total net income. The total net income is then compared to the financial eligibility standard for the appropriate assistance group size according to the financial eligibility chart. When the net income is compared with the financial eligibility standard, one of the following results will occur:

If the net income is equal to or less than the financial eligibility standard, the EA assistance group is eligible for EA on the basis of income.

If the net income is greater than the financial eligibility standard, the EA assistance group may be eligible for EA on the basis of income. However, the income in excess of the financial eligibility standard will be required to be applied toward the cost of the emergent need as a co-payment.

Former OAC 5101:1-7-192 - Co-Payment Requirements

"Co-payment" is that portion of the cost of emergency assistance (EA) items for which the family is responsible. It is the amount equal to the net income in excess of the financial eligibility standard and the resources in excess of fifty dollars.

The general principle of co-payment is that the assistance group must use whatever resource they have available to help meet the emergent need. The co-payment serves to reduce the amount of EA to be authorized by the county department of job and family services (CDJFS) so that the EA payments added to the co-payment will meet the emergent need. The "co-payment" is that portion which the assistance group must pay directly to the provider of the service. The co-payment is not made to the CDJFS.

It is recognized that having a thirty-day budget period can be a difficult process, as it is sometimes difficult to meet emergency needs from future income. Therefore, the CDJFS must help the assistance group understand that meeting emergency needs is a shared responsibility between the assistance group and the CDJFS. The caseworker must explain that the authorization of EA is dependent upon the co-payment. The CDJFS caseworker may be required to assist the family in making arrangements with the vendor to pay the co-payment from future funds.

The net income in excess of the financial eligibility standard is considered available towards the emergent need. "Net income" is income which remains after all deductions are allowed. After applying the financial eligibility standard to the net income, the amount remaining is considered countable income to be applied toward the emergent need as a co-payment.

When all members of the EA household are recipients of Aid For Dependent Children (ADC), Disability Assistance, or Supplemental Security Income (SSI), it is possible that the total household income will exceed the financial eligibility standard. Because ADC, DA, and SSI are need programs, it is inconsistent to require a co-payment when there is no other income. Therefore, the income portion of the co-payment requirement will be waived when the only source of income is public assistance. If there is other income in the household, either earned or unearned, in any combination with ADC, DA, or SSI, the calculation of income is determined as for any other EA applicant. Any income in excess of the financial eligibility standard is countable income to be applied toward the emergent need as a co-payment.

In computing the amount of resources available for co-payment, the first fifty dollars is exempt. Any liquid assets of the assistance group in excess of fifty dollars are considered countable resources to be applied toward the emergent need as a co-payment. There is no waiver of the resource portion of co-payment for ADC, DA, and SSI recipients.

The countable income and countable resources are added together to become the family's co-payment. The co-payment amount is the family's obligation to pay towards the emergent need. The CDJFS must provide a sufficient explanation to the assistance group

of the calculation of the co-payment and the responsibility of paying the co-payment to the vendor or provider of the service. If possible, it is advisable for the CDJFS to inform the vendor or provider of the service of the amount of the co-payment and of the assistance group's responsibility to make the co-payment. There is no requirement that the co-payment be made prior to issuance of EA. The CDJFS should be reasonably assured that the co-payment will be paid before EA is issued, to avoid issuance of EA for items not provided by the vendor because the co-payment was not paid.

When the amount of the co-payment is computed, it is applied to the emergent need to determine the amount of the EA payment.

If the co-payment is equal to or exceeds the emergent need, there is no EA payment necessary. The assistance group has sufficient excess income resources with which to meet the emergent need. If the co-payment is less than the emergent need, the amount of the co-payment must be applied toward the emergent need in one of two ways.

If the amount needed to meet the emergency exceeds the maximum payment allowed for the particular item needed, the CDJFS shall determine whether the maximum EA payment combined with the applicant's co-payment will meet the emergent need. If so, the CDJFS may authorize EA in an amount not to exceed the maximum payment permitted for that item. The principle is that when the applicant makes the co-payment, the two payments together will equal the total amount needed to meet the emergency. The exception to this principle is when issuing EA for medical services. In many instances, the maximum EA payment combined with the co-payment may not fully meet the emergent need. However, the maximum EA payment is to be authorized.

If the amount needed to meet the emergency is equal to or less than the maximum payment, the co-payment will be deducted from the maximum payment amount or the emergent need, whichever is less. The difference or deficit is the amount of EA payment made by the CDJFS. The EA payment combined with the co-payment should meet the emergent need.

In extreme emergencies, when the co-payment is to be paid from funds to be received later in the budget period, the co-payment may be waived. The agreement to waive the co-payment may require that the co-payment be paid when the funds are later received or the co-payment may be waived entirely. A waiver of co-payment requires approval of the CDJFS director or his designee.

The waiver of co-payment provision applies only to income which will be received in the budget period. Since the resources that are considered for EA eligibility are liquid assets, it is expected that such assets are available during the budget period. Thus, the co-payment may not be waived for the resource portion of the co-payment.

The CDJFS should exercise caution in the waiver of a co-payment. This procedure should be approved only in extreme situations when there is an emergent need for which payment must be made immediately and the vendor will not supply the service unless the

total amount due is paid. When the county agency is considering a waiver of the co-payment, the following steps are to be followed in order:

Assist the family in making arrangements with the vendor or provider of service to accept the co-payment amount at a later date when the future income is expected to be received. An exception then would not be required by the CDJFS.

Pay the total amount of the EA, within the allowable limits, but have the assistance group member sign a repayment agreement for the co-payment. When the assistance group member later receives the income, he will repay the amount of the co-payment to the CDJFS.

Reduce the co-payment due to unusual circumstances. For example, during the budget period, the assistance group member may have an unusual bill to pay which would make him unable to meet the co-payment. This type of unusual bill must be one that, if not paid promptly, would create another emergent situation.

Reduce the co-payment but pay the total maximum payment amount and have the assistance group member sign the repayment agreement for the reduced co-payment.

Waive the entire co-payment in extreme situations only and make the entire EA payment. If the co-payment is waived, there must be a statement included on the eligibility worksheet that the co-payment is waived. The assistance group record may also include a brief explanation of the reason for the waiver.

Former OAC 5101:1-7-20 - Financial Eligibility Standards

The following chart is used in determining financial eligibility for emergency assistance.

<i>Number in Assistance Group</i>	<i>Financial Eligibility Standard</i>	<i>Payment Standard</i>
<i>1</i>	<i>368</i>	<i>184</i>
<i>2</i>	<i>498</i>	<i>227</i>
<i>3</i>	<i>627</i>	<i>276</i>
<i>4</i>	<i>757</i>	<i>343</i>
<i>5</i>	<i>886</i>	<i>400</i>
<i>6</i>	<i>1015</i>	<i>445</i>
<i>7</i>	<i>1144</i>	<i>498</i>
<i>8</i>	<i>1273</i>	<i>553</i>
<i>9</i>	<i>1402</i>	<i>608</i>
<i>10</i>	<i>1531</i>	<i>662</i>
<i>11</i>	<i>1660</i>	<i>716</i>
<i>12</i>	<i>1789</i>	<i>771</i>
<i>13</i>	<i>1918</i>	<i>825</i>
<i>14</i>	<i>2047</i>	<i>879</i>
<i>15</i>	<i>2176</i>	<i>934</i>

Add one hundred twenty-nine dollars to the financial eligibility standard for each person above fifteen, i.e., a family of twenty would receive two thousand eight hundred twenty-one dollars.

Add sixty-nine dollars to the payment standard for each person above fifteen, i.e., a family of twenty would receive one thousand two hundred seventy-nine dollars.

Appendix B

POTENTIAL FEDERAL TANF PENALTIES

The following chart describes some of the penalties that could be applied against the TANF program for any violations that occur. For a complete listing of TANF penalties, reference 45 CFR 263 through 45 CFR 265.

Violation	Regulatory Citation	Method of Determining Penalty	Penalty Amount
Misusing TANF funds	45 CFR 263.10	Single audit	Amount of misused TANF funds
Intentionally misusing TANF funds	45 CFR 263.10	Single audit	Amount of penalty for misuse plus 5% of adjusted State Family Assistance Grant (SFAG)
Failing to submit report as required	45 CFR 265.8	Self-evident	4% reduction of adjusted SFAG for each quarter the state fails to report as required
Failing to repay Federal loan	45 CFR 264.40	Self-evident	Outstanding loan amount plus interest
Failing to meet TANF MOE requirement	45 CFR 263.8	TANF Financial report	Dollar-for-dollar reduction of amount of SFAG payable
Failing to remit contingency funds if the Contingency Fund MOE requirement is not met	45 CFR 264.76	TANF Financial report	Amount of contingency funds not remitted
Failing to replace penalty reduction with state funds	45 CFR 264.50	TANF Financial report	No more than 2% of adjusted SFAG plus amount of shortfall

Appendix C

Sample County Commissioner Certification

The _____ County Prevention, Retention and Contingency Policy is hereby approved by:

Name, Director
_____ County Dept. of Job and Family Services

Date

This is to certify that amendments to this policy were reviewed and approved by the _____ County Family Services Planning Council at its meeting on MMDDYYYY.

Name, Chair
_____ County Family Services Planning Council

Date

This is to certify that the _____ County Department of Job and Family Services has complied with ORC Chapter 5108 in adopting and amending this policy.

Name, President
Board of _____ County Commissioners

Date

Appendix D

Ohio Department of Job and Family Services
PREVENTION, RETENTION, AND CONTINGENCY PROGRAM (PRC)
APPLICATION FOR STATE MODEL

Name of Applicant	Telephone Numbers Where You Can Be Reached (###) ###-#### (###) ###-####	For Agency Use Only	
Current Address		Case Number	
Social Security Number		Date Sent	Date Returned
		County	Unique ID

1. Have you ever received public assistance from a human services department? Yes No If yes, give the county JFS, type of assistance received and the date received?

2. Explain what you need and estimate the amount you are requesting.

3. Give the name of other agencies you have contacted for help.

4. Have any other agencies helped you with this need? Yes No If yes, name the agency and tell how you were helped. If no, tell why you were not helped.

5. Complete the chart below verifying all income for all the members of your household, including yourself.

Name	Relationship to Applicant	Age	Education (last grade completed)	Source of Income (Earnings, Child Support, VA Benefits, SSA, SSI, etc.)	Monthly Amount of Income
1.					\$
2.					\$
3.					\$
4.					\$
5.					\$
6.					\$
7.					\$
8.					\$

6. Is anyone in your household eligible for, but not receiving court ordered child support? Yes No If yes, list name(s) of individuals not receiving court-ordered child support.

7. Does anyone in your household own a car, have access to a car, or live near a bus line? Yes No If yes, list the name(s) of individuals and the means of transportation.

8. Complete the chart below for employment history of each adult household member in the past 2 years.

Name	Employer Name	Type of Employment	Date Employment Began (month/year)	Date Employment Ended (month/year)	Reason for Leaving Employment	Currently Employed (yes/no)
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						

If you are eligible, the agency will limit assistance provided to the actual documented amount of need.

Signature of Applicant	Date
------------------------	------

For Agency Use Only

Date Application received (mm/dd/yy) _____ 30 day budget period: (mm/dd/yy) _____ To (mm/dd/yy) _____

Request. List the benefits and/or services requested and the amount needed for each

Benefit or Service	Amount Needed	Benefit or Service	Amount Needed
1.	\$		\$
2.	\$		\$
3.	\$		\$
4.	\$		\$
5.	\$		\$

Reason for Need.

Community Resources. List the community resources explored to meet this need. If any are utilized, complete the chart.

Agency	Amount	Benefit/Service
1.	\$	
2.	\$	

Income.

Source	Amount Available in Budget Period	Verification
1.	\$	
2.	\$	
3.	\$	
4.	\$	
5.	\$	

Total _____ (Compare to 50%, 150%, 175% or 200% of Federal Poverty Guideline)

PRC Approved. Complete chart. Benefit Issuance date _____ Benefit Amount \$ _____

Item/Service Provided	Date of Approval	Amount Paid	Vendor's Name and Address
		\$	
		\$	
		\$	

PRC Denied – Date of denial (mm/dd/yy) _____ Date Notice of Denial of Application sent (mm/dd/yy) _____

Reason for Denial

Signature of Caseworker	Date	Signature of Supervisor	Date
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Appendix E

Below is recommended language to inform PRC applicants of their rights:

NONDISCRIMINATION

Federal laws require that any agency administering federally funded programs and activities, cannot discriminate against you on the basis of race, color, national origin, sex, religion, political beliefs, disability, and age.

AMERICANS WITH DISABILITIES ACT

If you have a physical or mental condition that substantially limits one or more major life activities, you may have rights under Section 504 of the Rehabilitation Act and the Americans with Disabilities Act. Physical or mental conditions include, for example, a learning disability, mental retardation, a history of drug or alcohol addiction, depression, mobility impairment, or a hearing or vision impairment.

You can let us know if you have a disability. If you cannot do something we ask you to do, we can help you do it or we can change what you have to do.

Here are some of the ways we can help:

- We can call or visit if you are not able to come to our office.
- We can tell you what this letter means.
- If you are hearing impaired, we can provide a sign language interpreter when you come to the office.
- We can help you appeal any decisions that you do not agree with.

If you need some other kind of help, ask us. Call your caseworker.

LIMITED ENGLISH PROFICIENCY

If your primary language (spoken or written) is not English, we can help you. Let us know if your primary language is not English.

Here are some of the ways we can help:

- We can provide you with an interpreter who can speak English and your language when you come to the office. One will be provided at no cost to you.
- We may be able to provide you documents in your own language. If we cannot, then we will provide you with an interpreter who can read the documents to you.

INFORMATION ON CITIZENSHIP AND IMMIGRATION STATUS

If you are applying for PRC benefits, you must tell us about the citizenship and immigration status of only those persons you are seeking the benefits for. We may decide that certain members of your family are not eligible for PRC because, for

example, they do not have the right immigration status. If that happens, other family members may still be able to get PRC if they are otherwise eligible.

You may also need to tell us about your family's income and answer other questions we may ask.

INFORMATION REGARDING YOUR SOCIAL SECURITY NUMBER

Generally, if you are applying for PRC benefits, you must provide the social security number of only those persons you are seeking the benefits for. However, there may be instances where we need the social security numbers of members of the household to verify income or other eligibility criteria to determine eligibility even though they are not seeking PRC benefits themselves. We may decide that certain members of your family are not eligible for PRC because, for example, they do not have the right immigration status. If that happens, other family members may still be able to get PRC if they are otherwise eligible.

Social security numbers may be used when contacting appropriate persons or agencies to determine your eligibility and verify information you have given for PRC; for example, income, disability benefits or other similar benefits and programs. Such information may affect your household eligibility for PRC. Your social security number may be used for a felony warrant match; a match of persons in violation of probation or parole by law enforcement agencies; or for purposes of investigations, prosecutions, and criminal or civil proceedings that are within the scope of law enforcement agencies' official duties.

HOW DO I FILE A DISCRIMINATION COMPLAINT?

Your complaint can be filed with:

The Ohio Department of Job and Family Services
Bureau of Civil Rights
30 East Broad Street, 37th Floor
Columbus, Ohio 43215-3414

Fax to: (614) 752 - 6381

The Bureau of Civil Rights (BCR) staff is available to offer assistance with writing and filling your complaint(s). You can call BCR at (614) 644-2703 or Toll Free 1-866-227-6353, TTY (614) 995-9961 or Toll Free 1- 866-221-6700.

Appendix F

NOTICE OF APPROVAL OF YOUR APPLICATION FOR ASSISTANCE

Name	Case Name	
Street Address	Case Number	Program
City, State, and Zip Code	County	Mailing Date

Your application for _____ dated _____ has been approved effective _____.

Additional information:

The reason for this action is:

The rules that require this action are:

If you do not understand this proposed action or you want to talk to your caseworker about it, you may call:

Caseworker	District/ID	Telephone Number
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Your Right to a State Hearing

This notice is to tell you about action we are taking on your case. If you do not understand this action, you should contact your caseworker. After discussing the reasons for the action with your caseworker, it is possible that we will change our decision or that you will agree with the action.

If you do not agree with this action, you have a right to a state hearing. A state hearing lets you or your representative (lawyer, welfare rights worker, friend or relative) give your reasons against the action. We will also attend or be represented at the hearing to present our reasons. A hearing officer from the Ohio Department of Job and Family Services will decide who is right.

If you want a hearing we must receive your hearing request within 90 days of the mailing date of this notice. You do not need to return this form if you agree with the action.

If someone else makes a written hearing request for you, it must include a written statement, signed by you, telling us that person is your representative. Only you or your attorney can make a request by telephone.

If you want information on free legal services, but don't know the number of your local legal aid office, you can call the Ohio State Legal Services Association, toll free, at 1-800-589-5888, for the local number.

If you want a hearing, sign your name, and send this form to the Ohio Department of Job and Family Services, Bureau of State Hearings, P.O. Box 182825, Columbus, Ohio 43218-2825.

I want a county conference and a state hearing on this action.

I want a state hearing only.

I want a hearing.

Signature	Date	Telephone Number
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Now that you have been authorized for Prevention, Retention, and Contingency (PRC) services, you may be eligible for food stamp benefits. Please contact your county department of job and family services (CDJFS) if you wish to apply for food stamps. Keep this letter to verify that you have been authorized for PRC services. It will make a difference in the way your food stamp eligibility is determined. In addition, the CDJFS may need to request additional verification to determine eligibility for the Food Stamp program.

Appendix G

**Sample Notice of Right to Request Another
Worksite or Provider of Services**

Assistance Group Name	Case / Cat. / Seq.	Date Notice Given

Read all of this information before you sign your name. If you do not understand any part of this document, ask for help before signing. A copy of this information will be given to you for your records.

The County Department of Job and Family Services (CDJFS) has agreements with other agencies to provide services to families who may be receiving Prevention, Retention and Contingency (PRC) or act as worksites to families receiving Ohio Works First (OWF). Some of the services or worksites may be held at religious agencies, such as churches.

If you do not want to go to a religious agency for services or as your worksite, tell your worker at the CDJFS. Your worker must provide you with another agency for your worksite or to provide services. Your caseworker will tell you how long it will take to find another agency.

If you do not understand this notice, contact your caseworker.

I received a copy of, and I have read, my Notice of Right to Request Another Worksite or Provider of Services, or it has been read to me, and I understand it.

Signature of Applicant or Authorized Representative	Date

Appendix H

Example List of Services and Benefits

Note: This is an example. Counties have great flexibility in designing a PRC plan that meets the needs of their community.

Service or Benefit	TANF Purpose	Cap	Assistance Group	Economic Need Standard	Targeted Group
<p>Diversion Benefits: Up to 4 months of cash payment to assist with basic needs such as rent, utilities, and incidentals (Must also apply for Food Stamps, Medicaid, and Child Care and attend money management class, and be involved in a Job Preparation Service)</p>	Purposes 1 and 2	Up to 4 times the OWF payment standard for appropriate household size	<p>Parents with minor children</p> <p>Specified relatives with minor children</p>	50% of FPL	<p>Job ready individuals</p> <p>Displaced workers</p>
<p>Transportation Services and Benefits: Bus Passes, Van Shuttle Services, Reimbursement for work-related mileage, Driver's Education classes, Payment of drivers license fees and license plate fees</p> <p>Car repairs</p> <p>Down payment on automobile</p> <p>Auto insurance reimbursement</p>	Purposes 1 and 2	<p>No cap on services (as needed)</p> <p>For car repairs, lowest of 2 estimates not to exceed \$1,000 per episode of need</p> <p>For down payments, 3 to 1 match up to \$1,500 (once every 5 years)</p> <p>For auto insurance, actual cost for 12 month period</p>	<p>Parents with minor children</p> <p>Specified relatives</p> <p>Non-custodial parents</p>	175% of FPL	<p>Employed individuals for up to one year</p> <p>Unemployed individuals in education or training for up to 4 months</p>
Child Welfare Services:	Purposes	No cap on services (as	Parents with	200% of	Families

Service or Benefit	TANF Purpose	Cap	Assistance Group	Economic Need Standard	Targeted Group
Family counseling, Vocational and educational counseling, Respite care, Screen families who have been sanctioned from OWF for risk of child, Abuse or neglect to provide case management services designed to eliminate barriers to compliance, Family preservation and reunification services, Domestic violence services	1 and 2	needed)	minor children Specified relatives with minor children	FPL	with children at risk of abuse or neglect
Developmental Services: Help Me Grow, Youth development initiatives, Parenting classes, Prevention services for at-risk students, After-school programs for at-risk children.	Purposes 1, 2 and 3	No cap on services (as needed)	Families with minor children and specified relatives with minor children	200% of FPL	Children
Relocation Assistance: Moving expenses to relocate out of county or state	Purpose 2	Actual cost up to \$1,500 (once in lifetime)	Parents with minor children and specified relatives with minor children	150% of FPL	Individuals with secured employment Victims of domestic violence
Family Disaster Assistance: Benefits to assist with damage or loss sustained as a result of natural disaster upon declaration by County Commissioners, identified by the local Red Cross, or otherwise identified. Benefits to assist with damage or loss sustained as a result of natural disaster upon declaration by Governor	Purpose 1	Actual cost up to \$500 per household. Actual cost up to \$1500 per household.	Specified relatives with minor children and individuals living in their households. Parents with minor children and individuals living in their households.	200% of FPL 200% of FPL	Families sustaining disaster related damage or loss upon disaster declaration by County Commissioners or Red Cross. Families sustaining disaster related damage or loss upon

Service or Benefit	TANF Purpose	Cap	Assistance Group	Economic Need Standard	Targeted Group
					disaster declaration by Governor.
Pregnancy Prevention Services: Teen peer support group, Pregnancy prevention counseling, Contraceptive drugs and devices	Purpose 3	No cap on services (as needed)	Individuals	Available without regard to need	Pre-teens Teens Young adults
Kinship Care Services: Respite care, Training related to caring for special needs children, Legal Services	Purpose 1	No cap on services (as needed)	Specified relatives with minor children	200% of FPL	Relatives caring for minor children
Contingency Services <u>(An emergent need that threatens the health, safety, or living arrangement to the extent that it prohibits children from being cared for in their own home or inhibits job preparation, work and marriage):</u> Utility shut-offs, Purchase of bulk fuel for heating, Installation or repair of telephone, Security deposits, Eviction notices, Emergency shelter or temporary housing, Personal expenses (school clothing, winter coats, child restraint seats), Repair or purchase of furnace or water tank, Home repairs affecting basic structure (roof, plumbing, walls), Repair or purchase of appliances (stoves, fans, refrigerators, washer/dryer or air conditioners, Furniture (beds, mattress and box springs, kitchen table, chairs).	Purposes 1 and 2	Any number of individual payments to meet a non-recurrent crisis or episode of need up to \$2000 per assistance group per 12 month period (Note: purchase of air conditioning units must be accompanied by medical statement)	Parents with minor children and all other household members Specified relatives with minor children and all other household members	150% of FPL	Unemployed individuals Under-employed individuals Families with children at risk of abuse or neglect Victims of domestic violence

Appendix I

Ohio Department of Job and Family Services INDIVIDUAL DEVELOPMENT ACCOUNT REPORT

1. County submitting form	2. Date form completed
3. County contact person	4. Contact phone number
5. IDA reporting period	6. Number of individuals who participated in IDA who received OWF

Match Funding Source

7. Number of individuals in IDA where PRC/TANF is used as match	8. Number of individuals where other source of funding is used as match
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Demographics

9. Total IDA participants for reporting period						
10. Number of females participating				Number of males participating		
11. Number of participants by age		Under 20	20-29	30-49	50 plus	
12. Number of	White	African American	Hispanic	Native American/ Alaskan Native	Asian/Pacific Islander	Other

Account Information

13. Fiduciary organization	
14. Number of accounts opened	
15. Amount deposited in accounts	
16. Amount matched by contributors	17. Match rate \$
18. Contributors	

Outcome Measures

19. Personal residences purchased	20. Participants that used funds for business capitalization
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21. Participants that used funds for postsecondary educational expenses
22. Names of institutions

Withdrawals

23. Number of participants that withdrew funds for emergency	24. Number of participants that were terminated from program
25. Reasons for the withdrawal/termination	